

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

263-03-10
September 10, 2004

Via UPS Overnight

RECEIVED

SEP 13 2004

BUREAU OF AIR REGULATION

Mr. Al Linero
FDEP
Twin Towers Office Bldg
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

**Subject: *Rinker Materials Corporation
Miami Cement Plant, Miami, Florida
Permit No. 0250014-003-AV
Kiln Production Rate Increase***

Dear Al:

Enclosed are four copies of a Air Construction Permit Application for a production rate increase at the Rinker Miami Cement Plant.

If you need to contact me regarding this application, please do not hesitate to contact me at 352-377-5822 or jkoogler@kooglerassociates.com.

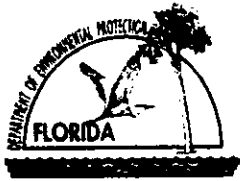
Sincerely,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK/lt

cc: Scott Benyon
Mike Vardeman
Charles Allen



Department of Environmental Protection

RECEIVED

SEP 13 2004

Division of Air Resource Management BUREAU OF AIR REGULATION APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

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

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

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

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)

– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Rinker Materials Corporation
2. Site Name: Rinker Miami Cement Plant
3. Facility Identification Number: 0250014
4. Facility Location: Street Address or Other Locator: 1200 NW 137th Ave. City: Miami County: Miami-Dade Zip Code: 33182
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: John B. Koogler PhD, PE
2. Application Contact Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Application Contact Telephone Numbers... Telephone: (352) 377-5822 ext. Fax: (352) 377-7158
4. Application Contact Email Address: vsgro@kooglerassociates.com

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	9-13-04
2. Project Number(s):	0250014-016-Ae
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

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

This application requests for a production rate increase for the following emission units:

- EU 018 : increase kiln feed rate from 220 tph to 267 tph ; increase clinker production rate from 137 tph to 162 tph ;
- EU 020 : increase the heat input rate from 437 mmBtu/hr to 485 mmBtu/hr.

APPLICATION INFORMATION

Scope of Application

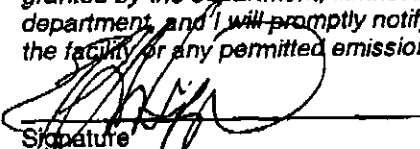
Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
017	Raw Materials Handling (Baghouses)	AC1F	\$0
018	In-line Kiln/Raw Mill & Clinker Cooler	AC1C	\$0
020	Coal Mill System	AC1F	\$0
025	Facilty Wide Fugitive Emissions	AC1E	\$0

Application Processing Fee

Check one: Attached - Amount: \$ 0 Not Applicable

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name : Ed Allsopp, VP of Cement Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Rinker Materials Corporation Street Address: 1200 NW 137 th Avenue City: Miami State: Florida Zip Code: 33182
3. Owner/Authorized Representative Telephone Numbers...N/A Telephone: (561) 820-8344 ext. Fax: (561) 820-8388
4. Owner/Authorized Representative Email Address: eallsopp@rinker.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility 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 requirements identified in this application to which the facility 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.</i>  Signature _____ Date <u>9/10/04</u>

Certification with original signature submitted under separate cover.

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name: N/A

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

- For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
- For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...

Organization/Firm: N/A

Street Address: N/A

City: N/A

State: N/A

Zip Code: N/A

4. Application Responsible Official Telephone Numbers...

Telephone: () - ext. Fax: () -

5. Application Responsible Official Email Address: N/A

6. Application Responsible Official Certification:

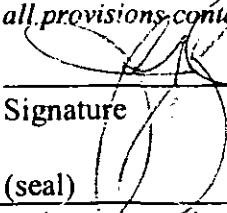
I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, 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.

Signature

Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler Registration Number: 12925
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377- 5822 ext. Fax: (352) 377 - 7158
4. Professional Engineer Email Address: jkoogler@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , 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.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , 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 <input checked="" type="checkbox"/> , 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.</i> <i>(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 <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature _____ Date <u>9/10/04</u> (seal) 

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 558.20 North (km) 2851.20		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 25/46/45 Longitude (DD/MM/SS) 80/25/10	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 32	6. Facility SIC(s): 3241
7. Facility Comment : N/A			

Facility Contact

1. Facility Contact Name: Michael D. Vardeman, Cement Division Environmental Manager
2. Facility Contact Mailing Address... Organization/Firm: Rinker Materials Corporation Street Address: 1200 NW 137th Avenue <div style="display: flex; justify-content: space-between; margin-top: 5px;"> City: Miami State: FL Zip Code: 33182 </div>
3. Facility Contact Telephone Numbers: Telephone: (305) 229-2955 ext. Fax: (305) 229-8015
4. Facility Contact Email Address: mvardeman@rinker.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 Name: N/A
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> City: State: Zip Code: </div>
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

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. <input type="checkbox"/> Small Business Stationary Source	<input checked="" type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	
<p>Kiln and Clinker Cooler subject to NSPS, Subpart F and plant is subject to NESHAP, Subpart LLL. Coal Mill is subject to NPS, Subpart Y.</p> <p>The facility is presumed to be a major source of HAPs.</p>	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM/PM ₁₀	A	N
SO ₂	A	N
NO _x	A	N
CO	A	N
VOC	A	N
DIOX	B	N
PB	B	N
SAM (Acid Mist)	B	N
H114 (Mercury)	B	N
HAPs (total)	A*	N
* Presumed Major		

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
N/A	N/A	N/A	N/A	N/A	N/A
7. Facility-Wide or Multi-Unit Emissions Cap Comment: N/A					

FACILITY INFORMATION

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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: unknown

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: 001
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: N/A
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input checked="" type="checkbox"/> Attached, Document ID: 002 <input type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. 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: **Previously Submitted**
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 On site 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

Additional Requirements Comment

N/A

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

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 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 for air permit. 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 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/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. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** 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 construction permitting and insignificant emissions units 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.

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised 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 emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Raw Material Handling (Baghouses)

3. Emissions Unit Identification Number: **017**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: 2000	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--	---	--	--

9. Package Unit: **N/A**

Manufacturer: **N/A**

Model Number: **N/A**

10. Generator Nameplate Rating: **N/A MW**

11. Emissions Unit Comment:

These activities are regulated for opacity by NSPS Subpart F and by NESHAP Subpart LLL.

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
Fabric Filters—Low Temperature

2. Control Device or Method Code(s): **018**

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: N/A
2. Maximum Production Rate: N/A
3. Maximum Heat Input Rate: N/A million Btu/hr
4. Maximum Incineration Rate: N/A pounds/hr N/A tons/day
5. Requested Maximum Operating Schedule: hours/day days/week weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment: N/A

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

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: See Emission Point ID; Item 3, below		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: K21-BF1: Baghouse for Additive Transfer: 3800 acfm K21-BF2: Baghouse for Additive Transfer: 4500 acfm K22-BF1: Baghouse for Soil/Ash Transfer: 4000 acfm K22-BF2: Baghouse for Clean Soil Bin: 9000 acfm K51-BF1: Baghouse for Slag/Soil Elevator: 5000 acfm 293-BF1: Baghouse for Soil/Ash Transfer: 4000 acfm 293-BF2: Baghouse for Soil/Ash Transfer: 4000 acfm 391-BF1: Baghouse for Raw Meal Transfer Elevator: 5500 acfm 391-BF2: Baghouse for Raw Meal Silo: 7000 acfm 391-BF3: Baghouse for Additive (Dust) Bin: 2000 acfm 431-BF1: Baghouse for Raw Mill (Kiln Feed) Transfer: 5500 acfm 431-BF2: Baghouse for Raw Mill Transfer (Return): 3000 acfm			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: See 3; above			
5. Discharge Type Code: H	6. Stack Height: Variable feet	7. Exit Diameter: Variable feet	
8. Exit Temperature: < 180 °F	9. Actual Volumetric Flow Rate: See 3; above acfm	10. Water Vapor: 2-3 %	
11. Maximum Dry Standard Flow Rate: See 3; above dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): See Pg. 7 North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: The annual material throughput rate of some of the material handling equipment associated with Emission Points addressed herein may increase as a result of the kiln production rate increase. However, the PM emission rates of the Emission Points will not increase, as the PM emission rates are a function of the air flow rates, PM discharge concentrations and the hours of operation; none of which will change.			

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Cement Manufacturing : Dry Process : Raw Material Transfer		
2. Source Classification Code (SCC): 3-05-006-12		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 1200	5. Maximum Annual Rate: 10,512,000	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: N/A		

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

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

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018	N/A	EL
PM ₁₀	018	N/A	EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99+%
3. Potential Emissions: 4.91 lb/hour 21.5 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.01 grains per actual cubic foot Reference: Table 1-1 of Permit No. 0250014-002-AC	7. Emissions Method Code: 0
8. Calculation of Emissions: 57,300 acfm x 0.01 gr/acf x 1.0 pound/7000 grains x 60 minutes/hr = 4.91 lb PM /hr @ 8760 hr/yr = 21.5 tons PM/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Material throughput rates may change ; however, the Potential Emissions of PM are a function only of flow, concentrations and hours of operation (8760 hr/yr) and therefore will remain unchanged. Potential Emissions are for all Emission Points collectively in this Emission Unit (EU-017).	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.01 grains per actual cubic foot	4. Equivalent Allowable Emissions: 4.91 lb/hour 21.5 tons/year
5. Method of Compliance: EPA Method 9	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 99+%
3. Potential Emissions: 4.17 lb/hour 18.3 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.0085 grains per actual cubic foot Reference: Table 1-1 of Permit No. 0250014-002-AC	7. Emissions Method Code: 0
8. Calculation of Emissions: 57,300 acfm x 0.0085 gr/acf x 1.0 pound/7000 grains x 60 minutes/hr = 4.17 lb PM /hr @ 8760 hr/yr = 18.3 tons PM/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Material throughput rates may change ; however, the Potential Emissions of PM are a function only of flow, concentrations and hours of operation (8760 hr/yr) and therefore will remain unchanged. Potential Emissions are for all Emission Points collectively in this Emission Unit (EU-017).	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.0085 grains per actual cubic foot	4. Equivalent Allowable Emissions: 4.17 lb/hour 18.3 tons/year
5. Method of Compliance: EPA Method 9	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule--BACT <input type="checkbox"/> Other
3. Allowable Opacity: 5 % Normal Conditions: 0 % Exceptional Conditions: 5 % Maximum Period of Excess Opacity Allowed: N/A min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment: Rule 62-297.620(4), F.A.C. This opacity limitation is more stringent than NSPS/NESHAP	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule--BACT <input type="checkbox"/> Other
3. Allowable Opacity: 10 % Normal Conditions: 0 % Exceptional Conditions: 10 % Maximum Period of Excess Opacity Allowed: N/A min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment: 40 CFR 63.1348	

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: 2002 & 2003 Test Date(s)/Pollutant(s) Tested: VE tests on all Emission Points in EU-017 <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> 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 <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [4] [017: Raw Material Handling (Baghouses)]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: <u>N/A</u>
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

None.

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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 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 for air permit. 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 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/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. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** 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 construction permitting and insignificant emissions units 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.

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised 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 emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
In-Line Kiln/ In-Line Raw Mill and Clinker Cooler

3. Emissions Unit Identification Number: **018**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: 2000	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit: **N/A**
 Manufacturer: **N/A** Model Number: **N/A**

10. Generator Nameplate Rating: **N/A** MW

11. Emissions Unit Comment:
This emissions unit is regulated by NSPS Subpart F and NESHAP Subpart LLL.

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Fabric Filter—High Temperature

Note: Single fabric filter collector for Kiln, Raw Mill and Clinker Cooler

2. Control Device or Method Code(s): **016**

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 267 tons per hour of dry feed to preheater			
2. Maximum Production Rate: 162 tons per hour of clinker produced			
3. Maximum Heat Input Rate: 485 million Btu/hr			
4. Maximum Incineration Rate: N/A pounds/hr N/A tons/day			
5. Requested Maximum Operating Schedule:		hours/day	days/week
		weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment:			
All limits are based on a 30-day averaging period.			

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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: Main Stack		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Kiln/Raw Mill/Cooler Stack			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: 018			
5. Discharge Type Code: V		6. Stack Height: 359 feet	
		7. Exit Diameter: 8 feet	
8. Exit Temperature: (1) 240°F (2) 420°F		9. Actual Volumetric Flow Rate: (1) 298,300 acfm (2) 348,000 acfm	
		10. Water Vapor: (1) 15% (2) 20%	
11. Maximum Dry Standard Flow Rate: (1) 191,250 dscfm (2) 168,000 dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates... Zone: East (km): See Pg. 7 North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Common baghouse for raw mill, kiln, and clinker cooler. (1) Raw Mill Operating ; typically 90% of the time (2) Raw Mill Down ; typically 10% of the time			

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 10

1. Segment Description (Process/Fuel Type): Mineral Products : Cement Manufacturing : Dry Process : Preheater/Precalciner Kilns		
2. Source Classification Code (SCC): 3-05-006-23		3. SCC Units: Tons Produced (Clinker)
4. Maximum Hourly Rate: 162 Tons Produced	5. Maximum Annual Rate: 1,419,120 Tons Produced	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: Rate in 30-day average. See Item 10 in Segment 2 of 10.		

Segment Description and Rate: Segment 2 of 10

1. Segment Description (Process/Fuel Type): Mineral Products : Cement Manufacturing : Dry Process : Preheater/Precalciner Kilns		
2. Source Classification Code (SCC): 3-05-006-22		3. SCC Units: Tons Produced (Feed)
4. Maximum Hourly Rate: 267 Tons Fed	5. Maximum Annual Rate: 2,338,920 Tons Fed	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: Rate in 30-day average. It is requested that only clinker production be limited by permit. Clinker production and Preheater Feed are related, thus there is no reason to limit both.		

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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

Segment Description and Rate: Segment 3 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Natural Gas : Cement Kiln		
2. Source Classification Code (SCC): 3-90-006-02		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 0.46 MMcf	5. Maximum Annual Rate: 4,046 MMcf	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 1050 MMBtu/MMcf
10. Segment Comment: 485 Mmbtu/hr x 1.0 MMcf/1050 MMBtu = 0.46 MMcf/hr @8760 hr/yr= 4,046 MMcf/yr		

Segment Description and Rate: Segment 4 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Bituminous Coal : Cement Kiln		
2. Source Classification Code (SCC): 3-90-002-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 18.7 Tons Burned	5. Maximum Annual Rate: 163,408 Tons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 26 MMBtu/Ton
10. Segment Comment: 485 MMBtu/hr x 1.0 tons/ 26 MMBtu = 18.7 tons/hr @ 8760 hr/yr = 163,408 Tons/yr		

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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

Segment Description and Rate: Segment 5 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Coke : Cement Kiln Petroleum Coke as In-Process Fuel		
2. Source Classification Code (SCC): 3-90-008-99		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 17.3 Tons Burned	5. Maximum Annual Rate: 151,735 Tons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 28 MMBtu/ Ton
10. Segment Comment: 485 MMBtu/hr x 1.0 tons/28 MMBtu = 17.3 tons/hr @ 8760 hr/yr = 151,735 tons/yr		

Segment Description and Rate: Segment 6 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Liquefied Petroleum Gas (LPG) : General Use of Propane in Kiln		
2. Source Classification Code (SCC): 3-90-010-99		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 5.16 Thousand Gallons Burned	5. Maximum Annual Rate: 45,198 Thousand Gallons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: Negligible	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 94 MMBtu/Thousand Gallons Burned
10. Segment Comment: 485 MMBtu x 1.0 Thousand Gallons Burned/94 MMBtu = 5.16 TGB/hr @8760 hr/yr=45,198 TGB/yr		

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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

Segment Description and Rate: Segment 7 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Distillate Oil : Cement Kiln Use of No. 2 Fuel Oil in Kiln		
2. Source Classification Code (SCC): 3-90-005-02		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 3.4 Thousand Gallons Burned	5. Maximum Annual Rate: 30,132 Thousand Gallons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0.5	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 141 MMBtu/Thousand Gallons Burned
10. Segment Comment: 485 MMBtu/hr x 1.0 Thousand Gallons Burned/141 MMBtu = 3.4 TGB/hr @ 8760 hr/yr = 30,156 TGB/yr		

Segment Description and Rate: Segment 8 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Residual Oil : Cement Kiln		
2. Source Classification Code (SCC): 3-90-004-02		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 3.32 Thousand Gallons Burned	5. Maximum Annual Rate: 29,100 Thousand Gallons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 2.5	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 146 MMBtu/Thousand Gallons Burned
10. Segment Comment: 485 MMBtu x 1.0 Thousand Gallons Burned/146 MMBtu = 3.32 TGB/hr @ 8760 hr/yr = 29,100 Thousand Gallons Burned		

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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

Segment Description and Rate: Segment 9 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Liquid Waste : General Use of Used Oil in Kiln		
2. Source Classification Code (SCC) : 3-90-013-99		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 4.02 Thousand Gallons Burned	5. Maximum Annual Rate: 31,866 Thousand Gallons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0.4	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 120 MMBtu/Thousand Gallons Burned
10. Segment Comment: 485 MMBtu/hr x 1.0 Thousand Gallons Burned/120 MMBtu = 4.02 TGB/hr Annual Rate limited to 31,866,000 gallons by 0250014-002-AC		

Segment Description and Rate: Segment 10 of 10

1. Segment Description (Process/Fuel Type): Industrial Process : In-Process Fuel Use : Solid Waste : Cement Kiln Combustion of nonhazardous solid waste. Materials included, but are not limited to : <ul style="list-style-type: none"> • Whole Tires and/or Tire-Derived Fuel (TDF) • Oil Filters • Booms and Rags from Spill Cleanup • Unused Diapers • Paper Products • Non-Chlorinated Plastic Waste 		
2. Source Classification Code (SCC) : 3-90-012-99		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: ~2.0 Tons Burned; 24-hr average	5. Maximum Annual Rate: 16,000 Tons Burned	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: ~24 MMBtu/Ton
10. Segment Comment: Maximum heat input (24-hr average) limited to 43.7 mmBtu/hr (Permit No 0250014-003-AV); or to a firing rate of ~2.0 tph of the above listed wastes. @8760 hr/vr = 16.000 tons/vr		

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	016	N/A	EL
PM ₁₀	016	N/A	EL
SO ₂	N/A	N/A	EL
NO _x	N/A	N/A	EL
CO	N/A	N/A	EL
VOC	N/A	N/A	EL
SAM	N/A	N/A	EL
H114—Mercury	N/A	N/A	EL
PB—Lead	N/A	N/A	EL
DIOX	N/A	N/A	EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99+%
3. Potential Emissions: 38.1 lb/hour 166.7 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.235 lb PM/ton of clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 0.235 lb PM/tons of clinker x 162 tons of clinker /hour = 38.1 lb PM/hr @ 8760 hr/yr = 166.7 tons/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Proposed emission factor is 0.235 lb PM/ton clinker. For Rinker's operation, the conversion factor from tons of dry preheater feed to tons of clinker is 0.607 (162 TPH clinker/267 TPH feed). Hence, the emission factor used for PM is equivalent to: 0.235 lbs PM/ton Clinker x 0.607 ton clinker/ton dry preheater feed = 0.143 lb PM/ton dry preheater feed. This is a reduction from the currently permitted and actual PM emissions of 44.0 lb/hr and 193.0 TPY. Averaging time fore emission limit is to be 3-hr ; the time for a M5 test.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.235 lb PM/ton of clinker	4. Equivalent Allowable Emissions: 38.1 lb/hour 166.7 tons/year
5. Method of Compliance: EPA Method 5	
6. Allowable Emissions Comment (Description of Operating Method): It is requested that the PM emission limit be expressed as 0.235 lb/ton clinker (rather than 0.143 lb/ton feed) for consistency with other emission limits.	

Allowable Emissions Allowable Emissions N/A of N/A

2. Basis for Allowable Emissions Code:	3. Future Effective Date of Allowable Emissions:
4. Allowable Emissions and Units:	5. Equivalent Allowable Emissions: lb/hour tons/year
6. Method of Compliance:	
7. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions N/A of N/A

8. Basis for Allowable Emissions Code:	9. Future Effective Date of Allowable Emissions:
10. Allowable Emissions and Units:	11. Equivalent Allowable Emissions: lb/hour tons/year
12. Method of Compliance:	
13. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 99+%
3. Potential Emissions: 32.4 lb/hour 141.9 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.20 lb PM₁₀/ ton of clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 0.20 lb PM₁₀/ton x 162 tons/hour of clinker = 32.4 lb PM₁₀/hr @ 8760 hr/year = 141.9 tons/year	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Proposed emission factor is 0.20 lb PM/ton clinker. For Rinker's operation, the conversion factor from tons of dry preheater feed to tons of clinker is 0.607 (162 TPH clinker/267 TPH feed). Hence, the emission factor used for PM₁₀ is equivalent to: 0.20 lbs PM/ton Clinker x 0.607 ton clinker/ton dry preheater feed = 0.121 lb PM₁₀/ton dry preheater feed. This is a reduction from the currently permitted and actual emissions fo 37.4 lb/hr and 164.0 tpy. The averaging time for emission limit is to be 3-hours ; the time for a M5 test.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.20 lb PM₁₀/ton of Clinker	4. Equivalent Allowable Emissions: 32.4 lb/hour 141.9 tons/year
5. Method of Compliance: EPA Method 5, with all PM assumed to be PM₁₀	
6. Allowable Emissions Comment (Description of Operating Method): It is requested that the PM emission limit be expressed as 0.235 lb/ton clinker (rather than 0.143 lb/ton feed) for consistency with other emission limits.	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO₂	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 81.0 lb/hour 354.8 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.50 lb SO₂/ton clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 0.50 lb SO₂/ton clinker x 162 ton clinker/hour=81.0 lb SO₂/hr @8760 hr/yr=354.8 tons SO₂/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: SO₂ emissions have been reduced from currently permitted and actual rates of 306 lb/hr and 1340 tpy. The average time for emission limit is to be 24-hours ; with compliance by CEMS.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.50 lb SO₂/ton Clinker	4. Equivalent Allowable Emissions: 81.0 lb/hour 354.8 tons/year
5. Method of Compliance: CEMS	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 648.0 lb/hour 2838 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 4.0 lb NO_x/ton Clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 4.0 lb NO_x/ton Clinker x 162 ton clinker/hr = 648.0 lb NO_x/hr @8760 hr/yr = 2838.2 ton NO_x/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: NO_x emissions have been reduced from currently permitted and actual emission rates of 671 lb/hr and 2940 tpy. The averaging time for emission limit is to be 30-days, with compliance by CEMS.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 4.0 lb NO_x/ton clinker	4. Equivalent Allowable Emissions: 648.0 lb/hour 2838.2 tons/year
2. Method of Compliance: CEMS	
3. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of NA

4. Basis for Allowable Emissions Code:	5. Future Effective Date of Allowable Emissions:
6. Allowable Emissions and Units:	7. Equivalent Allowable Emissions: lb/hour tons/year
8. Method of Compliance:	
9. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions N/A of N/A

10. Basis for Allowable Emissions Code:	11. Future Effective Date of Allowable Emissions:
12. Allowable Emissions and Units:	13. Equivalent Allowable Emissions: lb/hour tons/year
14. Method of Compliance:	
15. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 421.2 lb/hour 1844.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year			
6. Emission Factor: 2.60 lb CO/ton of clinker Reference: Proposed as BACT		7. Emissions Method Code: 0	
8. Calculation of Emissions: 2.60 lb CO/ton of clinker x 162 tons/hr = 421.2 lb/hr @ 8760 hr/yr = 1844.8 tons CO/ yr			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: CO emissions have increased 37.8 tpy ; less than the significance level of 100 tpy (See Attachment 002). The currently permitted and actual emissions have increased to 421.2 lb/hr (from 412.0 lb/hr) and 1844.8 tpy (from 1807 tpy). The averaging time for emission limit is to be 3-hours , the time for a M10 test.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 2.60 lb CO/ton of clinker	4. Equivalent Allowable Emissions: 421.2 lb/hour 1844.8 tons/year
5. Method of Compliance: EPA Method 10	
6. Allowable Emissions Comment (Description of Operating Method): None	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 19.4 lb/hour 85.0 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.12 lb VOC/ton of Clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 0.12 lbs VOC/ Ton of Clinker x 162 tons of Clinker/hr = 19.4 lbs VOC/ hr @ 8760 hr/yr = 85.0 tons VOC/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: VOC emissions have increased 13 tpy ; less than the significance level of 40 tpy (See Attachment 002). The currently permitted and actual emissions have increased to 19.4 lb/hr (from 16.4 lb/hr) and 85.0 tpy (from 72.0 tpy). The averaging time for the emission limit is to be a 30-operating day block average.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.12 lb VOC/ton Clinker	4. Equivalent Allowable Emissions: 19.4 lb/hour 85.0 tons/year
2. Method of Compliance: EPA M25A with measure of non-methane hydrocarbons with a THC CEMS for reasonable assurance.	
3. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

4. Basis for Allowable Emissions Code:	5. Future Effective Date of Allowable Emissions:
6. Allowable Emissions and Units:	7. Equivalent Allowable Emissions: lb/hour tons/year
8. Method of Compliance:	
9. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions N/A of N/A

10. Basis for Allowable Emissions Code:	11. Future Effective Date of Allowable Emissions:
12. Allowable Emissions and Units:	13. Equivalent Allowable Emissions: lb/hour tons/year
14. Method of Compliance:	
15. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SAM		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 3.24 lb/hour 14.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year			
6. Emission Factor: 0.02 lb SAM/ton Clinker Reference: Proposed as BACT		7. Emissions Method Code: 0	
8. Calculation of Emissions: 0.02 lb SAM/ton Clinker x 162 tons of Clinker/hr = 3.24 lb SAM/hr @ 8760 hr/yr = 14.2 tons SAM/yr			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: SAM emissions have increased 5.8 tpy ; less than the significance level of 7.0 tpy (See Attachment 002). The currently permitted and actual emissions have increased to 3.24 lb/hr (from 1.92 lb/hr) and 14.2 tpy (from 18.4 tpy). The averaging time for the emission limit is to be 3-hour ; the time for a M8 test.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.02 lb SAM/ton Clinker	4. Equivalent Allowable Emissions: 3.24 lb/hour 14.2 tons/year
5. Method of Compliance: EPA Method 8 (initial only)	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: H114--Mercury	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.023 lb/hour 0.099 tons/year (199 lb/yr)	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 14.0×10^{-5} lb Hg/ton Clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 14.0×10^{-5} lb Hg/ton Clinker x 162 tons of Clinker/hr = 2.27×10^{-2} lb Hg/hr @ 8760 hr/yr = 9.93×10^{-2} ton Hg/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: The proposed mercury emission rate is less than the significance level of 200 lb/yr (See Attachment 002).	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 14.0 X 10⁻⁵ lb Hg/yr	4. Equivalent Allowable Emissions: 2.27 x 10⁻² lb/hour 9.93 x 10⁻² tons/year
5. Method of Compliance: EPA Method 29 (initial only)	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: Pb--Lead	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.05 lb/hour 0.21 tons/year (420 lb/yr)	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 30.0 x 10⁻⁵ lb Pb/ton Clinker Reference: Proposed as BACT	7. Emissions Method Code: 0
8. Calculation of Emissions: 30.0 x 10⁻⁵ lb Pb/ton Clinker x 162 ton Clinker/hr = 0.05 lb Pb/hr @8760 hr/yr = 0.21 ton Pb/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: The proposed lead emission rate is less than the significance level of 1200 lb/yr (See Attachment 002).	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 30.0 x 10⁻⁵ lb Pb/ton Clinker	4. Equivalent Allowable Emissions: 0.05 lb/hour 0.21 tons/year
5. Method of Compliance: EPA Method 29 (initial only)	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: DIOX	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: N/A lb/hour	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: <ul style="list-style-type: none"> • 0.2 nanograms/dscm @ 7% O₂ if kiln baghouse inlet temperature is less than or equal to 400°F • 0.4 nanograms/dscm @ 7% O₂ if kiln baghouse inlet temperature is greater than 400°F Reference: MACT—40 CFR 63.1343(b)(3)(i)	7. Emissions Method Code: 0
8. Calculation of Emissions:	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: NESHAP LLL. The dioxin/furan emission limit is concentration based ; not mass based.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.2/0.4 ng/dscm @ 7% O₂	4. Equivalent Allowable Emissions: N/A lb/hour N/A tons/year
5. Method of Compliance: EPA Method 23 repeated every 30 months	
6. Allowable Emissions Comment (Description of Operating Method): NESHAP Subpart LLL	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule--BACT <input type="checkbox"/> Other
3. Allowable Opacity: 10 % Normal Conditions: 0 % Exceptional Conditions: 10 % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment: This opacity limitation is NSPS/NESHAP for clinker cooler 40 CFR 63.1345(a)(2)	

Visible Emissions Limitation: Visible Emissions Limitation N/A of N/A

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor 1 of 5

1. Parameter Code: VE	2. Pollutant(s): Opacity
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: United Sciences Model Number: 500C Compliance Monitor Serial Number: 7971657	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2002
7. Continuous Monitor Comment: NSPS Subpart F & NESHAP Subpart LLL	

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: EM	2. Pollutant(s): SO₂, NO_x
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Hartmann & Braun Model Number: URAS 14 Serial Number: 24511-0-224110202002	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2002
7. Continuous Monitor Comment: Combined SO₂-NO_x analyzer	

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: EM	2. Pollutant(s): THC
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: J.U.M Methane/Non-Methane Model Number: 109A Serial Number: Unknown	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2003
7. Continuous Monitor Comment: Monitor used for reasonable assurance with VOC emission limit	

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: FLOW	2. Pollutant(s): FLOW
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Monitor Labs Ultra Flow Model Number: 100 Serial Number: 1001038	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2002
7. Continuous Monitor Comment: N/A	

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: TEMP	2. Pollutant(s): N/A
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Unknown Model Number: Unknown Serial Number: Unknown	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2002
7. Continuous Monitor Comment: NESHAP Subpart LLL; to monitor kiln/raw-mill/cooler baghouse inlet temperature	

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: 9/2002 and 9/2003 Test Date(s)/Pollutant(s) Tested: PM/PM₁₀, SO₂, NO_x, VOC, CO, SAM, Pb, Hg <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable <p>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.</p>
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [2] of [4] [018: In-line Kiln/Raw Mill & Clinker Cooler]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: <u>N/A</u>
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

None.

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

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 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 for air permit. 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 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/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. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** 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 construction permitting and insignificant emissions units 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.

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised 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 emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **Coal Mill System**

3. Emissions Unit Identification Number: **020**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: 2000	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit: **N/A**
Manufacturer: **N/A** Model Number: **N/A**

10. Generator Nameplate Rating: **N/A MW**

11. Emissions Unit Comment: **These activities are regulated by NSPS Subpart Y.**

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Fabric Filters—Low Temperature

- **Baghouse L61-BF1; Coal/Coke Mill**
- **Baghouse L91-BF1; Coal/Coke Bin**

2. Control Device or Method Code(s): **018**

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 163,408 tons/yr; coal	
2. Maximum Production Rate: N/A	
3. Maximum Heat Input Rate: N/A million Btu/hr	
4. Maximum Incineration Rate: N/A pounds/hr N/A tons/day	
5. Requested Maximum Operating Schedule:	
hours/day	days/week
weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment: Coal/Coke throughput rate may increase as a result of the production rate increase. PM/PM₁₀ emissions will remain unchanged as they are a function of air flow, concentrations in the discharge air stream (0.01 gr/acf) and operating time (8760 hr/yr). None of these factors will change.	

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

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: (See 3; below)		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: L61-BF1: Baghouse for Coal/Coke Mill: 24,000 acfm L91-BF1: Baghouse for Coal/Coke Bin: 2,500 acfm			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: N/A	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates... Zone: East (km): See pg. 7 North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: N/A			

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Mineral Products : Coal Cleaning : Material Handling : Crushing		
2. Source Classification Code (SCC): 3-05-010-10		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 18.7, avg.	5. Maximum Annual Rate: 163,408	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 26
10. Segment Comment: 1 ton coal/26 mmBtu x 485 mmBtu/hr = 18.7 ton/hr @8760 hr/yr = 163,408 tons/yr Rates are 30-day average		

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

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

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018	None	EL
PM₁₀	018	None	EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control: 99+%	
3. Potential Emissions: 2.27 lb/hour 9.9 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year			
6. Emission Factor: 0.01 grains per actual cubic foot Reference:		7. Emissions Method Code: 0	
8. Calculation of Emissions: 26,500 acfm x 0.01 gr/acf x 1.0 pound/7000 grains x 60 min./hr = 2.27 lb/hr @ 8760 hr/yr = 9.9 tons/year			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Emissions from EU 020 ; coal mill with two emission points. Emissions will remain unchanged.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.01 grains per actual cubic foot	4. Equivalent Allowable Emissions: 2.27 lb/hour 9.9 tons/year
5. Method of Compliance: EPA Method 9	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: 99+%
3. Potential Emissions: 1.93 lb/hour 8.5 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: 0.0085 grains per actual cubic foot Reference:	7. Emissions Method Code: 0
8. Calculation of Emissions: 26,500 acfm x 0.0085 gr/acf x 1.0 pound/grains x 60 min/hr = 1.93 lb/hr @ 8760 hr/yr = 8.5 tons/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Emissions from EU 020 ; coal mill with two emission points. Emissions will remain unchanged.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.0085 grains per actual cubic foot	4. Equivalent Allowable Emissions: 1.93 lb/hour 8.5 tons/year
5. Method of Compliance: EPA Method 9	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: 5 % Normal Conditions: 0 % Exceptional Conditions: 5 % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment: This opacity limitation is more stringent than NSPS.	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment: 40 CFR 60.252(c)—Coal processing and conveying equipment, coal storage system, coal transfer and loading system.	

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code: TEMP	2. Pollutant(s): N/A
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Unknown Model Number: Unknown Serial Number: Unknown	
5. Installation Date: 2000	6. Performance Specification Test Date: 9/2002
7. Continuous Monitor Comment: 40 CFR 60.253(a)(1)	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date N/A
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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: 9/2002 Test Date(s)/Pollutant(s) Tested: TEMP <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable <p>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.</p>
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [3] of [4] [020: Coal Mill System]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: <u>N/A</u>
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

None.

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

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 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 for air permit. 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 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/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. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** 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 construction permitting and insignificant emissions units 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.

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised 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 emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Facility Wide Fugitive Emissions

3. Emissions Unit Identification Number: **025**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: 2000	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--	---	--	--

9. Package Unit: **N/A**
 Manufacturer: **N/A** Model Number: **N/A**

10. Generator Nameplate Rating: **N/A MW**

11. Emissions Unit Comment:
This emissions unit represents facility-wide fugitive emissions from :
- **RawMaterial Storage Handling**
 - **Clinker Storage and Handling**
 - **Vehicle Traffic onPaved and Unpaved Roads**
 - **Wind Erosion from Stockpiles**
 - **Mining and Quarrying Activities : Including Land Clearing, Drilling Blasting**
 - **Maintenance Activities : Including Maintenance Painting, Parts Cleaning, Welding**
 - **Diesel Engines**
 - **Sand and Media Blasting for Maintenance Paintings**
 - **Emergency Generators**
 - **Railcar Traffic**
 - **Fugitive Emissions from Other Emission Units**

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
Emissions minimized by management practices.

2. Control Device or Method Code(s): **N/A**

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: N/A
2. Maximum Production Rate: 1,419,120 tpy clinker
3. Maximum Heat Input Rate: N/A million Btu/hr
4. Maximum Incineration Rate: N/A pounds/hr N/A tons/day
5. Requested Maximum Operating Schedule: <div style="display: flex; justify-content: space-between;"> <div>hours/day</div> <div>days/week</div> </div> <div style="display: flex; justify-content: space-between;"> <div>weeks/year</div> <div>8760 hours/year</div> </div>
6. Operating Capacity/Schedule Comment: Fugitive PM and PM ₁₀ emissions are presumed to be proportional to annual clinker production.

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

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: N/A		2. Emission Point Type Code: N/A	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: N/A			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: F		6. Stack Height: N/A feet	
8. Exit Temperature: N/A °F		9. Actual Volumetric Flow Rate: N/A acfm	
7. Exit Diameter: N/A feet		10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: 5-20 feet	
13. Emission Point UTM Coordinates... Zone: East (km): See Pg. 7 North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Multiple sources of PM and PM₁₀ emissions.			

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Mineral Products : Fugitive Emissions : Process—See Comments Field		
2. Source Classification Code (SCC): 3-05-888-01		3. SCC Units: Tons Product (Clinker)
4. Maximum Hourly Rate: 162	5. Maximum Annual Rate: 1,419,120	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: This segment represents facility-wide fugitive emissions related to the production of cement, from: <ul style="list-style-type: none"> • RawMaterial Storage Handling • Clinker Storage and Handling • Vehicle Traffic onPaved and Unpaved Roads • Wind Erosion from Stockpiles • Mining and Quarrying Activities : Including Land Clearing, Drilling Blasting • Maintenance Activities : Including Maintenance Painting, Parts Cleaning, Welding • Diesel Engines • Sand and Media Blasting for Maintenance Paintings • Emergency Generators • Railcar Traffic • Fugitive Emissions from Other Emission Units 		

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

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

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Mineral Products : Cement Manufacturing : Dry Process ; Preheater/Precalciner Kilns		
2. Source Classification Code (SCC): 3-05-006-23		3. SCC Units: Tons Processed (Clinker)
4. Maximum Hourly Rate: 162	5. Maximum Annual Rate: 1,419,120	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: Fugitive PM and PM₁₀ emissions presumed proportional to clinker production.		

Segment Description and Rate: Segment N/A of N/A

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	(1)	None	NS
PM₁₀	(1)	None	NS
(1) Emissions controlled by management practices			

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 8.6 lb/hour 37.7 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: N/A Reference: Permit No 0250014-002-AC	7. Emissions Method Code: 2
8. Calculation of Emissions: PM emissions at 1,200,120 tpy clinker=31.9 tpy PM emissions at 1,419,120 tpy clinker = 1,419,120/1,200,120 x 31.9=37.7 tpy @ 8760 hr/yr=8.6 lb/hr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: N/A	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 37.7 tpy	4. Equivalent Allowable Emissions: 8.6 lb/hour 37.7 tons/year
5. Method of Compliance: EPA Method 22	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete 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 permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 3.0 lb/hour 13.2 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): N/A to tons/year	
6. Emission Factor: N/A Reference: Permit No 0250014-002-AC	7. Emissions Method Code: 2
8. Calculation of Emissions: 35% of PM emissions =37.7 tpy x 0.35 =13.2 tpy @ 8760 hr/yr=3.0 lb/hr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: N/A	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 13.2 tpy	4. Equivalent Allowable Emissions: 3.0 lb/hour 13.2 tons/year
5. Method of Compliance: EPA Method 22	
6. Allowable Emissions Comment (Description of Operating Method): N/A	

Allowable Emissions Allowable Emissions N/A of N/A

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

Allowable Emissions Allowable Emissions N/A of N/A

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

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: 20 % Normal Conditions: 0 % Exceptional Conditions: 20 % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 22	
5. Visible Emissions Comment: VE from multiple fugitive PM and PM₁₀ sources.	

Visible Emissions Limitation: Visible Emissions Limitation N/A of N/A

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [3] [017: Raw Material Handling (Baghouses)]

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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Unknown
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) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
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) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> 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) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable <p>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.</p>
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [4] of [4] [025: Facility-Wide Fugitives]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: <u>N/A</u>
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

None.

Attachment 001

Project Description

Rinker Materials Corporation (Rinker) operates a preheater/precalciner Portland cement plant in Miami, Dade County, Florida. The plant is permitted for a clinker production rate of 137 tons per hour and a corresponding preheater feed rate of 220 tons per hour; both on a 24-hour basis. The heat input rate to the plant is limited by permit to 437 mmBTU per hour (3.2 mmBTU per ton of clinker). The permitted fuels for the plant include coal, petroleum coke, natural gas, LP gas, distillate and residual fuel oils, on-specification and off-specification used oil, and various non-hazardous solid wastes. Rinker has gained operational experience with the plant and has recognized that the plant is capable of producing more than 137 tons per hour of clinker, 24-hour average. Rinker applied to the Department for authorization to conduct short-term production rate tests to evaluate the true production rate capacity of the plant. The approval was initially authorized by Permit 0250014-011-AC. This permit granted Rinker a 60-day period to conduct the necessary testing. Rinker has reapplied to the Department for authorization to extend the production rate test period through October 31, 2004. This request is pending.

Based upon the information Rinker has developed to this point in time, the company is proceeding with this permit application to permanently increase the clinker production rate to 162 tons per hour, to increase the preheater feed rate to 267 tons per hour, and to increase the heat input to the plant to 485 mmBTU per hour (3.0 mmBTU per ton of clinker). The fuels requested by Rinker are the same as those presently permitted.

To confirm the feasibility of permitting the existing plant for a clinker production rate of 162 tons per hour and a preheater feed rate of 267 tons per hour, Rinker is providing an independent, third-party opinion confirming that the plant is capable of such rates. This letter is included as Attachment 003.

Rinker does recognize that in order to burn some of the permitted solid waste fuels, a modification to the plant may be required. If such modification is required, Rinker recognizes that a separate Air Construction Permit will be required from the Department. No such fuel firing related modification is included as part of this Air Construction Permit Application.

Rinker has evaluated the feasibility of operating at a higher production rate during the short-term production rate test period that the Department has authorized. During this test period, Rinker has evaluated operating at sustained preheater feed rates of 245 tons per hour and 250 tons per hour. Operating at these rates has included an evaluation of the fineness target for raw meal in order to increase the raw mill production capacity and an evaluation of the feed chemistry necessary to maintain cement quality while operating at higher production rates. Rinker will continue to evaluate the factors that will lead to higher production rates under the extension to the short-term production rate tests that is now pending with the Department and under the permit issued as a result of this application.

Rinker does not foresee increasing the capacity of the raw mill to achieve higher production rates. Thus, an increase in the raw mill production capacity is not a subject of this application. Additionally, Rinker does not anticipate increasing the capacity of the coal mill for grinding either by bituminous coal or petroleum coke to achieve the increased heat input rate necessary to operate at the higher production capacity. Furthermore, Rinker does not anticipate the necessity to make changes to the kiln or calciner burners to fire any of the additional fuels required to achieve the higher heat input rates. Thus, modifications to the coal mill and burner systems are not a subject of this application.

The one matter that Rinker has recognized that may be necessary to achieve and sustain higher production rates is to overcome a problem with the main baghouse fan; the baghouse exhausting the kiln, raw mill, and clinker cooler. This fan was designed and installed to operate at 900 rpm. It was found during the short-term production tests, however, that the fan has a resonance problem that begins at a fan speed of approximately 850 rpm. It is anticipated that a replacement of the fan or fan wheel may be necessary in order to achieve the designed fan speed of 900 rpm. Rinker is of the opinion that the replacement of the fan or fan wheel is not a modification, but is more properly classified as the replacement of a defective piece of equipment with a like-kind piece of equipment without a defect. Rinker is notifying the Department of this possible

action and requests that this potential project be addressed as a non-permittable maintenance project in the permit to be issued.

Another project Rinker may elect to undertake potentially related to the requested production rate increase is the injection of high carbon (in the range 40-50 percent carbon) fly ash directly into the precalciner. Fly ash is used in the raw meal mix as a source of aluminum and perhaps other constituents necessary to produce the targeted raw feed chemistry. There appears to be a trend toward increasing carbon levels in fly ash as power plants work to reduce NO_x and mercury emissions. The inclusion of this high carbon fly ash in the raw meal and the introduction of this meal into the preheater could lead to an increase in carbon monoxide (CO) and possibly THC emissions as the temperature of the raw meal increases during its passage down the preheater. To eliminate the potential for increases in CO and THC emissions while utilizing a by-product of the electric power industry, some cement plants have begun introducing the high carbon fly ash directly into the precalciner, thus bypassing the preheater tower.

With the high carbon fly ash injected directly into the precalciner, the carbon will burn as a precalciner fuel while the inorganic fraction of the fly ash will mix with the preheater feed and enter the kiln.

To monitor the total material input rate to the pyroprocessing system in order to develop an appropriate factor for determining clinker production, the preheater

feed (minus the fly ash) will be determined as it now is and a LOI (Loss on Ignition) factor will be determined for the preheater feed (without the fly ash). The fly ash fed to the precalciner will be monitored and recorded and a LOI factor will be established for the fly ash. The total clinker production will be determined as a function of the preheater feed multiplied by the LOI for the preheater feed plus the fly ash feed multiplied by the LOI factor for the fly ash.

The carbon content of the fly ash (the LOI fraction) will be accounted for as fuel to the precalciner and included in the calculation of the total heat input to the pyroprocessing system.

This proposed fly ash injection project may or may not be immediately exercised by Rinker. Authorization of the project is requested, however, within the Air Construction Permit that will be issued based on this permit application. The project is not expected to significantly affect emissions and will not affect or change the emissions proposed for this project and included in the emission netting calculations.

Regarding changes in regulated air pollutants from the plant and air pollutants not previously emitted, the netting calculations presented in Attachment 002 demonstrate that there will be no significant increases, as defined by Table 212.400-2, F.A.C., in pollutants presently regulated. Furthermore, there will be no pollutants emitted from the plant that are not presently emitted.

The netting calculations were begun with the netting summary documented by Permit 0250014-002-AC. Since that time, Rinker was issued Permit 008-AC which resulted in an increase in VOC emissions from the plant and Permit 010-AC which resulted in an increase in PM and PM10 emissions from the plant. The VOC increase required a BACT Determination which is part of Permit 008-AC.

As a part of this Air Construction Permit Application for the production rate increase, Rinker is proposing reductions in the emission rates of PM/PM10, SO₂ and NO_x and less than significant increases in the emission rates of CO, VOC, sulfuric acid mist (SAM), mercury and lead.

The netting summary of contemporaneous increases and decreases in pollutant emission rates is presented in Attachment 002. This summary demonstrates that the proposed project will result in a net decrease in the emission rates of PM (170.6 tpy), SO₂ (1093.2 tpy), NO_x (90.3 tpy), and SAM (7.6 tpy). There will be net increases in the emission rate of PM10 (0.1 tpy), CO (96.2 tpy), VOC (13.0 tpy), mercury (198.7 lb/yr), and lead (125.7 lb/yr). None of the emission rate increases are significant as defined by Table 212.400-2, F.A.C.

Attachment 002

Air Pollutant Netting Calculations

NETTING CALCULATIONS

- The netting calculations begin with data from Permit 0250014-002-AC, issued 9/11/97, for the Rinker Miami Cement Plant Modernization.
- Increases in emissions since 9/11/97 include:

Pollutant	Permit	Date	Emission Increase (tpy)		
			From	To	Increase
VOC (1)	008-AC	3/1/02	60.0	72.0	12.0 ⁽²⁾
PM (3)	010-AC	11/5/03	0.6	12.6	12.0
PM10 (3)	010-AC	11/5/03	0.5	10.7	10.2

- (1) Increase the VOC limit of the kiln/raw-mill from 0.10 lb/ton clinker to 0.12 lb/ton clinker.
 - (2) A BACT determination was made for this increase. See Permit 0250014-008-AC.
 - (3) Increase the PM and PM10 emission limit of Finish Mills Nos. 4 and 5.
- Decreases in emissions since 9/11/97 – None.

- Emission changes associates with this proposed production rate increase:

Emission Unit	Pollutant	Emission Increase/Decrease (tpy)		
		From	To	Net Change
017 – Raw Materials Hndl.	PM		(1)	- 0 -
	PM10		(1)	- 0 -
018 – Kiln/RM/Cooler	PM	192.8	166.7	-25.1 (2)
	PM10	163.8	141.9	-21.9 (3)
	SO ₂	1340.0	354.8	-985.2 (4)
	NO _x	2940.3	2838.2	-102.1 (5)
	CO	1806.2	1844.8	+38.6 (6)
	VOC	72.0	85.0	+13.0 (7)
	SAM	8.4	14.2	+5.8 (8)
	HG	28.0 lb/yr	198.7 lb/yr	+170.7 lb/yr (9)
PB	90.0 lb/yr	425.7 lb/yr	+335.7 lb/yr (10)	
020 – Coal Mill	PM		(1)	- 0 -
	PM10		(1)	- 0 -
025 - Fugitive	PM	31.9	37.7	+5.8 (11)
	PM10	11.2	13.2	+2.0 (12)

- No change in emissions. PM and PM10 emissions are functions of flow rate of baghouse fan (CFM), the PM/PM10 discharge concentrations (0.10/0.085 gr/ft³) and operating time (8760 hr/yr). None of these will change as a result of the proposed production rate increase.
- PM emissions reduced from 0.20 lb/ton feed (0.33 lb/ton clinker) and 192.8 tpy to 0.235 lb/ton clinker and 166.7 tpy.
- PM10 emissions reduced from 0.17 lb/ton feed (0.28 lb/ton clinker) and 163.8 tpy to 0.20 lb/ton clinker and 141.9 tpy.
- SO₂ emissions reduced from 2.23 lb/ton clinker and 1340.0 tpy to 0.50 lb/ton clinker and 354.8 tpy.

- (5) NO_x emissions reduced from 4.90 lb/ton clinker and 2940.3 tpy to 4.00 lb/ton clinker and 2838.2 tpy.
- (6) CO emissions change from 3.01 lb/ton clinker and 1806.2 tpy to 2.60 lb/ton clinker and 1844.8 tpy.
- (7) VOC emissions change from 0.12 lb/ton clinker and 72.0 tpy to 0.12 lb/ton clinker and 85.0 tpy.
- (8) SAM emissions increase from 0.014 lb/ton clinker and 8.4 tpy to 0.020 lb/ton clinker and 14.2 tpy. Note, that at 14.2 tpy the SAM emissions increase net out to less than 7 tpy; the SAM significance level.
- (9) Mercury emissions increase from 2.4E – 05 lb/ton clinker and 28 lb/yr to 14.0E-05 lb/ton clinker and 198.7 lb/yr. Note, the proposed mercury emission limit is less than 200 lb/yr; the mercury significance level.
- (10) Lead emissions increase from 7.5E – 05 lb/ton clinker and 90.0 lb/yr to 30.0E – 05 lb/ton clinker and 425.7 lb/yr. Note, the proposed lead emission limit is less than 1200 lb/yr; the lead significance level.
- (11) Fugitive PM emissions are presumed proportional to clinker production. At 1,200,120 tpy clinker, fugitive PM emissions are 31.9 tpy (0250014-0020-AC). At the proposed production rate of 1,419,120 tpy clinker, the fugitive PM emissions will be 37.7 tpy.
- (12) Fugitive PM₁₀ emissions are presumed proportional to clinker production. At 1,200,120 tpy clinker, fugitive PM₁₀ emissions are 11.2 tpy (35% of the PM emissions) (0250014-0020-AC). At the proposed production rate of 1,419,120 tpy clinker, the fugitive PM₁₀ emissions will be 13.2 tpy.

- Netting Summary (tons/year)

Pollutant	Permit 002-AC	Permit 008-AC	Permit 010-AC	Proposed Changes	Net Change	PSD Sign	PSD Triggered (?)
PM	-163.3	0	12.0	-19.3 (2)	-170.6	25	No
PM10	9.8	0	10.2	-19.9 (2)	0.1	15	No
SO ₂	-108.0	0	0	-985.2	-1093.2	40	No
NO _x	11.8	0	0	-102.1	-90.3	40	No
CO	57.6	0	0	38.6	96.2	100	No
VOC	32.9	12.0 (1)	0	13.0	13.0 (3)	40	No
SAM	-13.4	0	0	5.8	-7.6	7	No
HG	28.0 lb/yr	0	0	170.7 lb/yr	198.7 lb/yr	200 lb/yr	No
PB	90.0 lb/yr	0	0	335.7 lb/yr	425.7 lb/yr	1200 lb/yr	No
DIOX	NA	0	0	(4)	(4)	NA	No

- (1) PSD triggered and BACT analysis conducted
- (2) Sum of changes in Kiln/RM/Cooler emissions and Fugitive emissions
- (3) Increase since last BACT determination (008-AC)
- (4) DIOX emission limit will continue to be the concentration based emission limit established by the NESHAP for Portland Cement Plants.

Attachment 003

Plant Capacity Verification

To be provided under separate cover.