KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ▪ FAX/377-7158

July 27, 2010

Mara Grace Nasca
Air Program Administrator
D.E.P. Southwest District - Tampa
13051 N. Telecom Parkway
Temple Terrace, Fl. 33637

Subject: American Cement Company – Sumterville Cement Plant
Facility ID No. 1190042, Sumter County
Application for Initial Title V Air Operation Permit

1190042-007-AV

Dear Ms. Nasca,

Please find enclosed four (4) copies of the referenced permit application. Please contact me if you have any questions.

Regards,

Steven C. Cullen, PE
Koogler & Associates, Inc.

Consultant to American Cement Company

Copy to: Cary Cohrs – American Cement Company

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

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

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

Air Operation Permit – Use this form to apply for:

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

Dept. of Environmental Protection
AUG 11 2010
Southwest District

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **American Cement Company (ACC)**	
2. Site Name: **Sumterville Cement Plant**	
3. Facility Identification Number: **1190042**	
4. Facility Location... Street Address or Other Locator: **4750 E C470** City: **Sumterville** County: **Sumter** Zip Code: **33585**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☐ Yes ☒ No

Application Contact

1. Application Contact Name: **Steve Cullen**
2. Application Contact Mailing Address... Organization/Firm: **Koogler and 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 E-mail Address: **SCullen@kooglerassociates.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 08/11/10	3. PSD Number (if applicable):
2. Project Number(s): 1190042-007-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

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

Air Construction Permit

☐ Air construction permit.

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

☒ Initial Title V air operation permit.

☐ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

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

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Title V Air Operation Permit Application incorporating equipment permitted under Construction Permit No. 1190042-001-AC, as extended.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Raw Material Quarrying, Crushing, and Storage		
002	Raw Materials, Conveying, Storage, and Processing		
003	Pyroprocessing System		
004	Clinker and Additives Storage and Handling		
005	Finish Mill		
006	Cement Handling, Storage, Packing, and Loadout		
007	Coal and Petroleum Coke Grinding System		
008	Fugitive Dust from Storage Piles, Paved Roads, and Unpaved Roads		

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name :

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: ( ) - ext. Fax: ( ) -

4. Owner/Authorized Representative E-mail Address:

5. Owner/Authorized Representative Statement:

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

   _____ _____
   Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name: **Cary O. Cohrs – President**

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, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **American Cement Company, L.L.C.**
   Street Address: **4750 E CR 470, P. O. BOX 445**
   City: **Sumterville** State: **FL** Zip Code: **33585**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(352) 569 - 5393** ext. Fax: **(352) 569 - 5397**

5. Application Responsible Official E-mail Address:
   ccohrs@americancementcompany.com

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 8/9/10

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Steven C. Cullen, P.E.**
   Registration Number: **45188**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Koogler and 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 E-mail Address: **SCullen@kooglerassociates.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☒, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, 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 ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☒, if so), I further certify that, with the exception of any changes detailed as part of this application, 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.

NO. 45188

Signature

7/27/2010
Date

(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) **399.8** North (km) **3181.9**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **28/45/45** Longitude (DD/MM/SS) **82/01/35**	
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 :			

Facility Contact

1. Facility Contact Name: **Charles Robertson – Environmental Manager**
2. Facility Contact Mailing Address... Organization/Firm: **American Cement Company, L.L.C.** Street Address: **4750 E C470** City: **Sumterville** State: **FL** Zip Code: **33585**
3. Facility Contact Telephone Numbers: Telephone: **(352) 569 - 5393** ext. Fax: **(352) 569 - 5397**
4. Facility Contact E-mail Address: **crobertson@americancementcompany.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:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official E-mail 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. ☐ Small Business Stationary Source	☒ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☒ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☒ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	

12. Facility Regulatory Classifications Comment:

The American Cement Company, L.L.C. is subject to applicable portions of:

- **40 CFR 60, Subpart F: NSPS for Portland Cement Plants (superseded by 40 CFR 63, Subpart LLL)**
- **40 CFR 60, Subpart Y: NSPS for Coal Preparation Plants**
- **40 CFR 60, Subpart OOO: NSPS for Nonmetallic Mineral Processing Plants**
- **40 CFR 63, Subpart LLL: NESHAP for Portland Cement Industry**

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
CO	**A**	**N**
NOX	**A**	**N**
PM	**A**	**N**
PM10	**A**	**N**
SO2	**A**	**N**
VOC	**B**	**N**
D/F	**B**	**N**
THC	**B**	**N**
H114	**B**	**N**

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's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Facility Plot Plan** ☐ Previously Submitted, Date:__
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Facility Process Flow** ☐ Previously Submitted, Date:__
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Precautions to Prevent UPM**

Additional Requirements for Air Construction Permit Applications – Not Applicable

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):
   ☐ Attached, Document ID:_____
3. Rule Applicability Analysis:
   ☐ Attached, Document ID:_____
4. List of Exempt Emissions Units:
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification:
   ☐ Attached, Document ID:_____ ☐ Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:_____ ☐ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
   ☒ Attached, Document ID: **List of Insignificant Activities**

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: **Identification of Applicable Requirements**
   ☐ 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:_____ ☒ Not Applicable

   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities Onsite but Not Required to be Individually Listed
   ☒ Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____ ☒ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:_____ ☒ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

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

1. Acid Rain Program Forms:

   Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not an Acid Rain source)

   Phase II NO_X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

   New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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 Quarrying, Crushing, and Storage

3. Emissions Unit Identification Number: **001**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: **32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of equipment needed for the raw material quarrying, crushing, and storage operation. Includes a primary crusher at the quarry and a raw materials storage building (MSB). This application includes information on the backup crusher system, not described in the AC.**

EMISSIONS UNIT INFORMATION

Section [1] of [8] **EU001 - Raw Material Quarrying, Crushing, and Storage**

Emissions Unit Control Equipment/Method: Control _ of _

1. Control Equipment/Method Description: **N/A**
2. Control Device or Method Code:

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **750 tons/hour (30 day average, dry basis)**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment: **Based on Permit No. 1190042-001-AC. Applies to crusher.**	

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: **Raw Material Storage Bldg.**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **• Primary crushing, backup crusher, and all belt conveyor points to raw material storage.** **• All conveyors and hoppers associated with additives handling and storage.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **F**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: **77** °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: **0** feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Primary Crushing**		
2. Source Classification Code (SCC): **3-05-006-09**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **750 TPH (dry basis)**	5. Maximum Annual Rate: **1,482,000 tons (dry basis)**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Hourly and annual rate based on Permit No. 1190042-001-AC. Applies to Crushing Operations.**		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Raw Material Transfer**		
2. Source Classification Code (SCC): **3-05-006-12**	3. SCC Units: **Tons Handled**	
4. Maximum Hourly Rate: **750**	5. Maximum Annual Rate: **1,482,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

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

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Raw Material Piles**		
2. Source Classification Code (SCC): **3-05-006-08**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **750**	5. Maximum Annual Rate: **1,482,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

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			**NS**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **N/A**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions _ of _

1. Basis for Allowable Emissions Code: **N/A**	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):	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: **VE15**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **15 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9 initially and annually**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC and 40 CFR 60 Subpart OOO, Table 3. Applies to the Crusher, and the backup Crusher.**	

Visible Emissions Limitation: Visible Emissions Limitation **2** of **2**

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9 initially and annually; 1 hour**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC and 40 CFR 60 Subpart OOO, Table 3. Applies to conveyor belt transfer points and other affected facilities.**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU001/ Backup Crusher**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☒ Previously Submitted, Date: **December 2, 2009 and February 5, 2010**
   Test Date(s)/Pollutant(s) Tested: **November 2, 2009 and January 14, 2010 VE**
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements - General**
2. Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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 Materials, Conveying, Storage, and Processing

3. Emissions Unit Identification Number: **002**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A			**32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of equipment needed for the conveyance, storage, and processing of raw materials. Includes one homogenizing silo (nominal 10,000 ton capacity) and associated transport system. Note that Dust Collector F03 was not constructed, and that G10 has lower flow than initially proposed.**

EMISSIONS UNIT INFORMATION

Section [2] of [8] **EU002 - Raw Materials, Conveying, Storage, and Processing**

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:

Five (5) Low Temperature Baghouses:

- **F10 - Dust collector for raw meal transfer at air lift to homogenizing silo**
- **G07 - Dust collector for raw meal transfer to homogenizing silo**
- **G10 - Dust collector for homogenizing silo bin vent**
- **E38 - Dust collector for filter dust surge bin**
- **H08 - Dust collector for raw meal transfer from homogenizing silo**

2. Control Device or Method Code: **016, 017**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: *	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment: ***Process rate not limited by Permit No. 1190042-001-AC.**	

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: **Raw mill**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:

- **F10 - Dust collector for raw meal transfer at air lift to homogenizing silo**
- **G07 - Dust collector for raw meal transfer to homogenizing silo**
- **G10 - Dust collector for homogenizing silo bin vent**
- **E38 - Dust collector for filter dust surge bin**
- **H08 - Dust collector for raw meal transfer from homogenizing silo**

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:

5. Discharge Type Code: **H**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	

15. Emission Point Comment:

ID	Temp, °F	ACFM	Moisture	DSCFM
F10	**200**	**1,000**	**2%**	**784**
G07	**200**	**22,000**	**2%**	**17,248**
G10	**200**	**3,000**	**2%**	**2,352**
E38	**300**	**6,000**	**2%**	**4,085**
H08	**200**	**1,000**	**2%**	**784**

Source: As-built specifications.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Raw Material Transfer**		
2. Source Classification Code (SCC): **3-05-006-12**	3. SCC Units: **Tons Handled**	
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: ***Throughput rate is not limited by Permit No. 1190042-001-AC for this emission unit.**		

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, 017**		**EL**
PM10	**016, 017**		**EL**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **2.16** lb/hour **9.5** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **BACT, Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.01 gr/dscf) x (1 lb/7,000 gr) x (784 dscfm + 17,248 dscfm + 2,352 dscfm + 4,085 dscfm + 784 dscfm) x (60 minutes/hour)
= 2.16 lb/hour

Annual Emissions:
(2.16 lb/hour) x (8,760 hours/year) x (1.0 ton/2,000 lbs)
= 9.5 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **2.16** lb/hour **9.5** tons/year
5. Method of Compliance: **Method 9 in lieu of Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **1.52** lb/hour **6.6** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.007 gr/dscf** Reference: **BACT, Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.007 gr/dscf) x (1 lb/7,000 gr) x (784 dscfm + 17,248 dscfm + 2,352 dscfm + 4,085 dscfm + 784 dscfm) x (60 minutes/hour)
= 1.52 lb/hour

Annual Emissions:
(1.52 lb/hour) x (8,760 hours/year) x (1.0 ton/2,000 lbs)
= 6.6 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.007 gr/dscf**	4. Equivalent Allowable Emissions: **1.52** lb/hour **6.6** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 3

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **05** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9 annually; 30 minutes** **1 hour initial testing was performed under AC, not 3 hour since emissions were no more than 10% 3 times during the first hour.**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-212.400(BACT), F.A.C. Applies to Baghouse emissions.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 3

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9 annually; 30 minutes** **1 hour initial testing was performed under AC, not 3 hour since emissions were no more than 10% 3 times during the first hour.**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-212.400(BACT), F.A.C. Applies to material source emissions.**	

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation **3** of **3**

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 22 monthly; 1 minute**	
5. Visible Emissions Comment: **Based on the rule NESHAP LLL.**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _ of _

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU002**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **May 10, 2010**
   Test Date(s)/Pollutant(s) Tested: **April 7 and 22, 2010**
   _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements - General**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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: **Pyroprocessing System**

3. Emissions Unit Identification Number: **003**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: **32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit ☐ CAIR Unit ☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **The pyroprocessing system consists of a dry process pre-heater/calciner rotary kiln with in-line raw mill that simultaneously dries raw materials using the exhaust gas from the kiln, PH/C, or cooler. The preheater is designed with a staged combustion calciner and a selective non-catalytic reduction (SNCR) system. Other equipment includes an air heater for use when additional drying capacity is required, and a clinker cooler with reciprocating grates, cooling air fans, and hot air ducting to the kiln, PH/C or in-line raw mill. All emissions from the pyroprocessing system are directed to a single stack. Note reduction in air flow for Baghouse E21 from initial application.**

Emissions Unit Control Equipment/Method: Control 1 of 5

1. Control Equipment/Method Description:

Low-NOx Burners and Indirect Firing: **The main kiln will be equipped with a low NOx burner that will create distinct combustion zones within the flame. An indirect firing system will be used to reduce the amount of primary air injected with the fuel used in the main kiln burner.**

2. Control Device or Method Code: **205**

Emissions Unit Control Equipment/Method: Control 2 of 5

1. Control Equipment/Method Description:

***Staged Combustion in the Calciner (SCC)*: The kiln system will be designed such that the introduction of fuel, air and meal to the calciner will be staged or sequenced for the reduction of NOx emissions.**

2. Control Device or Method Code: **025**

Emissions Unit Control Equipment/Method: Control 3 of 5

1. Control Equipment/Method Description:

***SNCR*: A selective non-catalytic reduction (SNCR) system shall be designed, constructed and operated to achieve the permitted levels for NOx emissions from the pyroprocessing system. The SNCR system will consist of an aqueous ammonia tank, pumps, piping, compressed air delivery, injectors, control system, and other ancillary equipment. Aqueous ammonia will be injected at a location(s) in the preheater/calciner with an appropriate temperature profile to support the SNCR process.**

2. Control Device or Method Code: **107**

Emissions Unit Control Equipment/Method: Control 4 of 5

1. Control Equipment/Method Description:

One (1) High Temperature Baghouse

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

Emissions Unit Control Equipment/Method: Control 5 of 5

1. Control Equipment/Method Description:

The use of low-sulfur raw materials will help to keep SO_2 emissions below permitted levels.

2. Control Device or Method Code: **046**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **125 TPH (24-hour rolling average)**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: **400** million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment: **Based on Permit No. 1190042-001-AC.**	

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: **Preheater Tower**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: • **All emissions from the pyroprocessing system are directed to a single stack.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **349** feet	7. Exit Diameter: **12.8** feet
8. Exit Temperature: **308** °F	9. Actual Volumetric Flow Rate: **409,650** acfm	10. Water Vapor: **2** %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Based on as-built information.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Preheater Kiln**		
2. Source Classification Code (SCC): **3-05-006-22**	3. SCC Units: **Tons Clinker Produced**	
4. Maximum Hourly Rate: **125 TPH (24-hour average)**	5. Maximum Annual Rate: **1,095,000 tons**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Based on Permit No. 1190042-001-AC.**		

Segment Description and Rate: Segment 2 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Clinker Cooler**		
2. Source Classification Code (SCC): **3-05-006-14**	3. SCC Units: **Tons Clinker Produced**	
4. Maximum Hourly Rate: **125 TPH (24-hour average)**	5. Maximum Annual Rate: **1,095,000 tons**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Based on Permit No. 1190042-001-AC.**		

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

Segment Description and Rate: Segment 3 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Bituminous Coal; Cement Kiln/Dryer**		
2. Source Classification Code (SCC): **3-90-002-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **15.4**	5. Maximum Annual Rate: **134,769.2**	6. Estimated Annual Activity Factor:
7. Typical % Sulfur: **0.6 - 5.4**	8. Typical % Ash: **4 - 20**	9. Million Btu per SCC Unit: **26**
10. Segment Comment: **From AP-42, Appendix A-5: Coal heat value = 13,000 Btu/lb = 26 MMBtu/ton** **From Permit No. 1190042-001-AC: 400 MMBtu/hr** **(400 MMBtu/hr)(1/26 ton/MMBtu) = 15.4 tons/hr** **(400 MMBtu/hr)(1/26 ton/MMBtu)(8760 hr) = 134,769.2 tons/year**		

Segment Description and Rate: Segment 4 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Coke**		
2. Source Classification Code (SCC): **3-90-008-99**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **15**	5. Maximum Annual Rate: **131,729.3**	6. Estimated Annual Activity Factor:
7. Typical % Sulfur: **0.5 – 1.0**	8. Typical % Ash: **0.5 – 5.0**	9. Million Btu per SCC Unit: **26.6**
10. Segment Comment: **From AP-42, Appendix A-5: Coke heat value = 13,300 Btu/lb = 26.6 MMBtu/ton** **From Permit No. 1190042-001-AC: 400 MMBtu/hr** **(400 MMBtu/hr)(1/26.6 ton/MMBtu) = 15 tons/hr** **(400 MMBtu/hr)(1/26.6 ton/MMBtu)(8760 hr) = 131,729.3 tons/year**		

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

Segment Description and Rate: Segment 5 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Solid Waste** • **Tires used as supplemental fuel at up to 15% of total heat value (60 MMBtu/hour)**		
2. Source Classification Code (SCC): **3-90-012-89**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **2.5**	5. Maximum Annual Rate: **21,900**	6. Estimated Annual Activity Factor:
7. Typical % Sulfur:	8. Typical % Ash:	9. Million Btu per SCC Unit: **24**
10. Segment Comment: **From Fuel Report: Tire heat value = 12,000 Btu/lb = 24 MMBtu/ton** **From Permit No. 1190042-001-AC: 60 MMBtu/hr** **(60 MMBtu/hr)(1/24 ton/MMBtu) = 2.5 tons/hr** **(60 MMBtu/hr)(1/24 ton/MMBtu)(8760 hr) = 21,900 tons/year**		

Segment Description and Rate: Segment 6 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Residual Oil; Cement Kiln/Dryer** **On-Spec used oil** ❑ **For use in pyroprocessing system and air heater per 1190042-003-AC**		
2. Source Classification Code (SCC): **3-90-004-02**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **1**	5. Maximum Annual Rate: **1,500**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Based on Permit No. 1190042-001-AC**		

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

Segment Description and Rate: Segment 7 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Distillate Oil; Cement Kiln/Dryer** • **Applies to the Kiln**		
2. Source Classification Code (SCC): **3-90-005-02**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **2.92**	5. Maximum Annual Rate: **25,576.6**	6. Estimated Annual Activity Factor:
7. Typical % Sulfur: **0.4**	8. Typical % Ash: **Negligible**	9. Million Btu per SCC Unit: **137**
10. Segment Comment: **From AP-42, Appendix A-5: No. 2 heat value = 137,000 Btu/gal = 137 MMBtu/TGB** **From Permit No. 1190042-001-AC: 400 MMBtu/hr** **(400 MMBtu/hr)(1/137 TGB/MMBtu) = 2.92 TGB/hr** **(400 MMBtu/hr)(1/137 TGB/MMBtu)(8760 hr) = 25,576.6 TGB/year**		

Segment Description and Rate: Segment 8 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Natural Gas; Cement Kiln/Dryer** • **Applies to the Kiln**		
2. Source Classification Code (SCC): **3-90-002-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.381**	5. Maximum Annual Rate: **3,337.1**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **Negligible**	8. Maximum % Ash: **Negligible**	9. Million Btu per SCC Unit: **1,050**
10. Segment Comment: **From AP-42, Appendix A-5: Gas heat value = 1,050 Btu/scf = 1,050 MMBtu/MMcf** **From Permit No. 1190042-001-AC: 400 MMBtu/hr** **(400 MMBtu/hr)(1/1,050 MMcf/MMBtu) = 0.381 MMcf /hr** **(400 MMBtu/hr)(1/1,050 MMcf/MMBtu)(8760 hr) = 3,337.1 MMcf /year**		

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

Segment Description and Rate: Segment 9 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Distillate Oil** • **Applies to the Air Heater**		
2. Source Classification Code (SCC): **3-90-005-89**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **0.263**	5. Maximum Annual Rate: **2301.9**	6. Estimated Annual Activity Factor:
7. Typical % Sulfur: **0.4**	8. Typical % Ash: **Negligible**	9. Million Btu per SCC Unit: **137**
10. Segment Comment: **From AP-42, Appendix A-5: No. 2 heat value = 137,000 Btu/gal = 137 MMBtu/TGB** **From Permit No. 1190042-001-AC: 36 MMBtu/hr** **(36 MMBtu/hr)(1/137 TGB/MMBtu) = 0.263 TGB/hr** **(36 MMBtu/hr)(1/137 TGB/MMBtu)(8760 hr) = 2301.9 TGB/year**		

Segment Description and Rate: Segment 10 of 10

1. Segment Description (Process/Fuel Type): **Industrial Processes; In-Process Fuel Use; Natural Gas** • **Applies to the Air Heater**		
2. Source Classification Code (SCC): **3-90-006-89**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.0343**	5. Maximum Annual Rate: **300.3**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **Negligible**	8. Maximum % Ash: **Negligible**	9. Million Btu per SCC Unit: **1,050**
10. Segment Comment: **From AP-42, Appendix A-5: Gas heat value = 1,050 Btu/scf = 1,050 MMBtu/MMcf** **From Permit No. 1190042-001-AC: 36 MMBtu/hr** **(36 MMBtu/hr)(1/1,050 MMcf/MMBtu) = 0.0343 MMcf /hr** **(36 MMBtu/hr)(1/1,050 MMcf/MMBtu)(8760 hr) = 300.3 MMcf /year**		

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
CO			**EL**
NOX	**205, 025, 107**		**EL**
PM/PM10	**016**		**EL**
SO2	**046**		**EL**
VOC			**EL**
D/F			**EL**
THC			**EL**
H114			**EL**

F1-1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **362.5** lb/hour **1,588** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **2.9 lb/ton of clinker** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **2.9 lb/ton of clinker**	4. Equivalent Allowable Emissions: **362.5** lb/hour **1,588** tons/year
5. Method of Compliance: **CEMS; 30 day rolling average**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC; BACT**	

F1-2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **NOX**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **See Comment** **243.8** lb/hour **1,068** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **1.95 lb/ton of clinker** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment: **There is a limit of 3.0 lb/ton clinker and 375 lb/hr during a period between CEMS certification, beginning April 1, 2010, and the next 155,000 tons of clinker produced.**	

F2-2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **1.95 lb/ton of clinker**	4. Equivalent Allowable Emissions: **243.8** lb/hour **1,068** tons/year
5. Method of Compliance: **CEMS; 30 day rolling average**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC, BACT**	

F1-3. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM/PM10**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **19.13** lb/hour **83.8** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.153 lb/ton of clinker** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-3. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.153 lb/ton of clinker**	4. Equivalent Allowable Emissions: **19.13** lb/hour **83.8** tons/year
5. Method of Compliance: **EPA Method 5 initially and annually; 3 x 1 hr**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC, BACT**	

F1-4. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **SO2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **25** lb/hour **109.5** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.20 lb/ton of clinker** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-4. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.20 lb/ton of clinker**	4. Equivalent Allowable Emissions: **25** lb/hour **109.5** tons/year
5. Method of Compliance: **CEMS; 24 hour rolling average**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC, BACT**	

F1-5. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:	
3. Potential Emissions: **15** lb/hour **65.7** tons/year		4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year		
6. Emission Factor: **0.12 lb/ton of clinker** Reference: **Permit No. 1190042-001-AC**		7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years	
10. Calculation of Emissions:		
11. Potential, Fugitive, and Actual Emissions Comment:		

F2-5. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.12 lb/ton of clinker**	4. Equivalent Allowable Emissions: **15.0** lb/hour **65.7** tons/year
5. Method of Compliance: **CEMS; 30 day block average**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC, BACT**	

F1-6. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **D/F**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.20 ng/dscm TEQ or 0.40 ng/dscm TEQ (T<204°C) at 7% O_2** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-6. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.20 ng/dscm @ 7% O_2 (T ≥ 204°C) or 0.40 ng/dscm @ 7% O_2 (T < 204°C)**	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: **EPA Method 23**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC and 40 CFR 63.1343(c)(3). Concentration based standard.**	

F1-7. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **THC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **50 ppmvd (as propane) at 7% O_2** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-7. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **50 ppmvd (as propane) at 7% O_2**	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: **CEMS**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC and 40 CFR 63.1343(c)(4). Concentration based standard.**	

F1-8. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **H114**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **122 lb/12 month period** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2-8. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions **1** of **2**

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **122 lb/12 month period**	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: **Material Balance**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC**	

Allowable Emissions Allowable Emissions **2** of **2**

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **41 ug/dscm**	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: **CEMS**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on 40CFR63.1343(c)(5)**	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☐ Rule ☒ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **COMS; 6 minute block average**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor **1** of **8**

1. Parameter Code: **EM**	2. Pollutant(s): **CO**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC (BACT)**	

Continuous Monitoring System: Continuous Monitor **2** of **8**

1. Parameter Code: **EM**	2. Pollutant(s): **NOX**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC (BACT)**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor **3** of **8**

1. Parameter Code: **EM**	2. Pollutant(s): **THC, VOC**
3. CMS Requirement: ☒ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC (NESHAP LLL)**	

Continuous Monitoring System: Continuous Monitor **4** of **8**

1. Parameter Code: **EM**	2. Pollutant(s): **SO2**
3. CMS Requirement: ☒ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC (NESHAP LLL)**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor **5** of **8**

1. Parameter Code: **EM**	2. Pollutant(s): **H114**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC**	

Continuous Monitoring System: Continuous Monitor **6** of **8**

1. Parameter Code: **TEMP**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor 7 of 8

1. Parameter Code: **VE**	2. Pollutant(s): **Opacity, COMS**
3. CMS Requirement:	☒ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC (BACT) for 10% Opacity**	

Continuous Monitoring System: Continuous Monitor 8 of 8

1. Parameter Code: **EM**	2. Pollutant(s): **CO2**
3. CMS Requirement:	☒ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Greenhouse Gas Reporting 40CFR98**	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU003**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Fuel Specification – EU003**

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **May 13 and May 7, 2010**
   Test Date(s)/Pollutant(s) Tested: **March 31 and April 1-2, 2010: DF**
   March 25 – April 1, 2010: PM/PM10, CO, SO2, NOX, CO2, THC
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements – EU003**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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:
Clinker and Additives Storage and Handling

3. Emissions Unit Identification Number: **004**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A			**32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of the equipment needed for the conveying and storage of clinker, and the additive (limestone and gypsum) storage and conveying to the finish mills. Includes two clinker silos, gypsum and limestone pile covered storage, and associated conveyors, and control equipment. Note that L-08 dust collector was not constructed, DC-1 and DC-2 were added, and L-06 has a greater flow rate than initially proposed.**

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:

Five (5) Baghouses:

- **L03 - Dust collector for clinker transfer cooler discharge**
- **L06 - Dust collector for clinker transfer to clinker silo #1**
- **M08 - Dust collector for clinker transfer to clinker silo #2**
- **DC-1 – Dust collector from clinker transfer from clinker silos (west)**
- **DC-2 – Dust collector from clinker transfer from clinker silos (east)**

2. Control Device or Method Code: **016, 017**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: *	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule: **24** hours/day **52** weeks/year	**7** days/week **8760** hours/year
6. Operating Capacity/Schedule Comment: ***Process rate not limited by Permit No. 1190042-001-AC.**	

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: **Clinker Silos**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:

- **L03 - Dust collector for clinker transfer cooler discharge**
- **L06 - Dust collector for clinker transfer to clinker silo #1**
- **M08 - Dust collector for clinker transfer to clinker silo #2**
- **DC-1 – Dust collector from clinker transfer from clinker silos (west)**
- **DC-2 – Dust collector from clinker transfer from clinker silos (east)**

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:

5. Discharge Type Code: **H**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: **77 °F**	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)

15. Emission Point Comment:

ID	Height, FT	Diam, FT	Temp, °F	ACFM	Moisture	DSCFM
L03	32	1.6	290	3,000	2%	2,070
L06	203	1.6	300	6,500	2%	4,425
M08	25	1.6	290	4,000	2%	2,760
DC-1	--	--	200	353	2%	277
DC-2	--	--	200	353	2%	277

Source: Permit No. 1190042-001-AC Application and as-built information.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing; Clinker Transfer**		
2. Source Classification Code (SCC): **3-05-006-16**	3. SCC Units: **Tons Clinker**	
4. Maximum Hourly Rate: **125 TPH***	5. Maximum Annual Rate: **1,095,000 TPY**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: ***Clinker throughput is automatically limited by the clinker production limit established in Permit 1190042-001-AC.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Raw Material Transfer** ❑ **Additives to finish mill to make cement**		
2. Source Classification Code (SCC): **3-05-006-12**	3. SCC Units: **Tons Handled**	
4. Maximum Hourly Rate: **34**	5. Maximum Annual Rate: **297840**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Throughput rate is estimated for this SCC from Permit No. 1190042-001-AC as the difference between clinker production and cement production = 34 tph**		

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, 017**		**EL**
PM10	**016, 017**		**EL**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **0.84** lb/hour **3.7** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **BACT, Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.01 gr/dscf) x (1 lb/7,000 gr) x (2,070 dscfm + 4,425 dscfm + 2,760 dscfm + 277 dscfm + 277 dscfm) x (60 minutes/hour)
= 0.84 lb/hour

Annual Emissions:
(0.84 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs)
= 3.7 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **0.84** lb/hour **3.7** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control: **N/A**
3. Potential Emissions: **0.59** lb/hour **2.6** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.007 gr/dscf** Reference: **BACT, Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.007 gr/dscf) x (1 lb/7,000 gr) x (2,070 dscfm + 4,425 dscfm + 2,760 dscfm + 277 dscfm + 277 dscfm) x (60 minutes/hour)
= 0.59 lb/hour

Annual Emissions:
(0.59 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs)
= 2.6 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.007 gr/dscf**	4. Equivalent Allowable Emissions: **0.59** lb/hour **2.6** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **05 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9 annual 30-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-212.400(BACT), F.A.C. Applies to Baghouse emissions.**	

Visible Emissions Limitation: Visible Emissions Limitation **2** of **2**

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 22, monthly 1-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and NESHAP LLL.**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _ of _

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU004**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **May 10, 2010**
   Test Date(s)/Pollutant(s) Tested: **April 22, 25, and 26, 2010**
   VE
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements – EU004**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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: **Finish Mill**

3. Emissions Unit Identification Number: **005**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: **32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of one finish mill in a closed circuit with a high efficiency air separator and cyclones capable of processing approximately 159 tons per hour of cement. Other equipment will include associated enclosed conveyors, bucket elevators, belts, and control equipment. Note decrease in air flow for N93, and increase in air flow for N94.**

EMISSIONS UNIT INFORMATION

Section [5] of [8] **EU005 – Finish Mill**

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: **Two (2) Medium Temperature Baghouses:** • **N93 - Finish Mill Air Separator** • **N94 - Finish Mill**
2. Control Device or Method Code: **017**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: *	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule: **24** hours/day **52** weeks/year	**7** days/week **8760** hours/year
6. Operating Capacity/Schedule Comment: ***Process rate not limited by Permit No. 1190042-001-AC.**	

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: **Finish Mill Bldg.**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:

- **N93 Finish Mill Air Separator**
- **N94 Finish Mill**

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:

5. Discharge Type Code: **H**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)

15. Emission Point Comment:

ID	Height, FT	Diam, FT	Temp, °F	ACFM	Moisture	DSCFM
N93	130	6.00	200	150,000	2%	117,600
N94	130	4.00	230	40,000	2%	30,000

Source: Permit No. 1190042-001-AC Application, as-built information

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Clinker Grinding**		
2. Source Classification Code (SCC): **3-05-006-17**	3. SCC Units: **Tons Cement Produced**	
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: ***Process rate not limited by Permit No. 1190042-001-AC.**		

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**		**EL**
PM10	**018**		**EL**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.65** lb/hour **55.4** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.01 gr/dscf) x (1 lb/7,000 gr) x (117,600 dscfm + 30,000 dscfm) x (60 minutes/hour) = 12.65 lb/hour

Annual Emissions:
(12.65 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs) = 55.4 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **12.65** lb/hour **55.4** tons/year
5. Method of Compliance: **Method 5, (N93) prior to permit renewal**	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **8.86** lb/hour **38.8** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.007 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.007 gr/dscf) x (1 lb/7,000 gr) x (117,600 dscfm + 30,000 dscfm) x (60 minutes/hour) = 8.86 lb/hour

Annual Emissions:
(8.86 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs) = 38.8 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.007 gr/dscf**	4. Equivalent Allowable Emissions: **8.86** lb/hour **38.8** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 9, annual 30-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-297.310, F.A.C. Applies to Baghouse emissions.**	

Visible Emissions Limitation: Visible Emissions Limitation **2** of **2**

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 22, daily 6-minute (mill sweep); Method 22, monthly 1-minute (other points)**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC and NESHAP LLL**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU005**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **September 29, 2009**
   Test Date(s)/Pollutant(s) Tested: **August 18 and September 23, 2009**
   PM/PM10, VE
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements – EU005**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

Separator dust collector (N93) not subject to CAM, as it is an inherent process device utilized for material recovery.

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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:
Cement Handling, Storage, Packing, and Loadout

3. Emissions Unit Identification Number: **006**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: **32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of equipment needed for cement storage, loadout to trucks, and bagging operations. Note that a quadrated cement silo with an interstitial silo was constructed with rotary shut-off valves, flow control valve, and airslides. The cement bagging operation includes a screen, surge hopper, bucket elevator and packer. Operation is estimated to be nominally 500 tons per hour of cement to truck loadout and/or bagging operation.**

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: **Six (6) Medium Temperature Baghouses:** • **N91 - Cement Transfer from Finish Mill** • **Q25 - Cement Silo #1, #2, #3, #5** • **Q26 - Cement Silo #4** • **Q14 - Truck Loadout #1 (West)** • **Q17 - Truck Loadout #2 (East)** • **R12A - Packing Plant**
2. Control Device or Method Code: **017**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: *	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment: ***Process rate not limited by Permit No. 1190042-001-AC.**	

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: **Packhouse Bldg.**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:

- **N91 Cement Transfer from Finish Mill**
- **Q25 Cement Silo #1, #2, #3, #5**
- **Q26 Cement Silo #4**
- **Q14 Truck Loadout #1 (West)**
- **Q17 Truck Loadout #2 (East)**
- **R12A Packing Plant**

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:

5. Discharge Type Code: **H**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)

15. Emission Point Comment:

ID	Height, FT	Diam, FT	Temp, °F	ACFM	Moisture	DSCFM
N91	46	2	200	8,000	2%	6,272
Q25	186	2.1	200	12,000	2%	9,408
Q26	186	2.1	200	12,000	2%	9,408
Q14	30	1.4	200	3,000	2%	2,352
Q17	30	1.4	200	3,000	2%	2,352
R12A	30	2.1	200	12,000	2%	9,408

Source: Permit No. 1190042-001-AC Application, as-built information

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Cement Loadout**		
2. Source Classification Code (SCC): **3-05-006-19**	3. SCC Units: **Tons Cement Produced**	
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: ***Process rate not limited by Permit No. 1190042-001-AC.**		

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	**017**		**EL**
PM10	**017**		**EL**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **3.36** lb/hour **14.7** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.01 gr/dscf) x (1 lb/7,000 gr) x (6,272 dscfm + 9,408 dscfm + 9,408 dscfm + 2,352 dscfm+ 2,352 dscfm+ 9,408 dscfm) x (60 minutes/hour)
= 3.36 lb/hour

Annual Emissions:
(3.36 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs)
= 14.7 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **3.36** lb/hour **14.7** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **2.35** lb/hour **10.3** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.007 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.007 gr/dscf) x (1 lb/7,000 gr) x (6,272 dscfm + 9,408 dscfm + 9,408 dscfm + 2,352 dscfm+ 2,352 dscfm+ 9,408 dscfm) x (60 minutes/hour) = 2.35 lb/hour

Annual Emissions:
(2.35 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs) = 10.3 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

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

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **N/A**
3. Allowable Emissions and Units: **0.007 gr/dscf**	4. Equivalent Allowable Emissions: **2.35** lb/hour **10.3** tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method): **BACT, Permit No. 1190042-001-AC**	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 9, annual 30-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-212.400(BACT), F.A.C. Applies to Baghouse emissions.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 22, monthly 1-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC and NESHAP LLL**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _ of _

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU006**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **September 21, 2009**
   Test Date(s)/Pollutant(s) Tested: **August 18, 19, 27 and September 5, 2009 VE**
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements – EU006**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

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

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

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

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

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 and Petroleum Coke Grinding System

3. Emissions Unit Identification Number: **007**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A			**32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **Consists of equipment needed for coal and petroleum coke grinding and storage. Equipment will include a coal/petroleum coke grinding mill, storage bins, and associated conveyor systems. Note that S22 is (2) baghouses with greater flow rates, and S26 has a lower flow rate than initially proposed. Note that coal mill heating air is supplied from a duct off the kiln ID fan, not from the clinker cooler.**

EMISSIONS UNIT INFORMATION

Section [7] of [8] **EU007 – Coal and Petroleum Coke Grinding System**

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: **Three (3) Medium Temperature Baghouses:** • **S22 Coal/Petroleum Coke Mill Including Thermal Dryer (two baghouses)** • **S26 Coal/Petroleum Coke Bin**
2. Control Device or Method Code: **017**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **18.5 TPH**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule: **24** hours/day **52** weeks/year	**7** days/week **8,760** hours/year
6. Operating Capacity/Schedule Comment: **Based on Permit No. 1190042-001-AC**	

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: **Coal Mill**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: • **S22 Coal/Petroleum Coke Mill Including Thermal Dryer (two baghouses)** • **S26 Coal/Petroleum Coke Bin**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **H**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	

15. Emission Point Comment:

ID	ACFM	Temp	Moisture	DSCFM
S22	17,500 (ea)	200 (ea)	2%	13,720 (ea)
S26	800	200	2%	627

Source: As-built specifications.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Coal Mining, Cleaning, and Material Handling; Coal Transfer**		
2. Source Classification Code (SCC): **3-05-010-11**	3. SCC Units: **Tons Coal**	
4. Maximum Hourly Rate: **18.5 TPH**	5. Maximum Annual Rate: **134,904 tons**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Based on Permit No. 1190042-001-AC**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): **Industrial Processes; Petroleum Industry; Coke Handling System; Storage and Transfer**		
2. Source Classification Code (SCC): **3-06-013-01**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **18.5 TPH**	5. Maximum Annual Rate: **134,904 tons**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Based on Permit No. 1190042-001-AC**		

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	**017**		**EL**
PM10	**017**		**EL**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **2.41** lb/hour **10.5** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.01 gr/dscf) x (1 lb/7,000 gr) x (13,720 dscfm + 13,720 dscfm + 627 dscfm) x (60 minutes/hour)
= 2.41 lb/hour

Annual Emissions:
(2.41 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs)
= 10.5 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **2.41** lb/hour **10.5** tons/year
5. Method of Compliance: **EPA Method 5 initially and within 12 months prior to permit renewal (S22)**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC**	

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.68** lb/hour **7.4** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.007 gr/dscf** Reference: **Permit No. 1190042-001-AC**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Hourly Emissions:
(0.007 gr/dscf) x (1 lb/7,000 gr) x (13,720 dscfm + 13,720 dscfm + 627 dscfm) x (60 minutes/hour)
= 1.68 lb/hour

Annual Emissions:
(1.68 lb/hour) x (8,760 hours/year) x (ton/2,000 lbs)
= 7.4 tons/year

11. Potential, Fugitive, and Actual Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.007 gr/dscf**	4. Equivalent Allowable Emissions: **1.68** lb/hour **7.4** tons/year
5. Method of Compliance: **EPA Method 5 initially and within 12 months prior to permit renewal (S22)**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 1190042-001-AC**	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 9, annually 30-minute**	
5. Visible Emissions Comment: **Based on Permit No. 1190042-001-AC, and Rule 62-297.310, F.A.C. Applies to Baghouse emissions.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9, annually 30-minute**	
5. Visible Emissions Comment: **NSPS Subpart Y and NESHAP Subpart LLL**	

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H 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):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Based on Permit No. 1190042-001-AC, NSPS Subpart Y**	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Process Flow Diagram – EU007**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: **NA** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **Detailed Description of Control Equipment**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SSM Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **O&M Plan** ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ Previously Submitted, Date: **May 7, 2010**
   Test Date(s)/Pollutant(s) Tested: **March 26 and April 6, 2010**
   PM/PM10, VE
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **Identification of Applicable Requirements – EU007**
2. Compliance Assurance Monitoring: ☒ Attached, Document ID: **Compliance Assurance Monitoring**
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

Coal/coke mill baghouse (S22) not subject to CAM as it is an inherent process device utilized for material recovery.

III. EMISSIONS UNIT INFORMATION

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

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

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

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

EMISSIONS UNIT INFORMATION
Section [8] of [8] EU008 – Fugitive Dust from Storage Piles, Paved and Unpaved Roads

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:
Fugitive Dust from Storage Piles, Paved and Unpaved Roads

3. Emissions Unit Identification Number: **008**

4. Emissions Unit Status Code: **A**	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: **32**

8. Federal Program Applicability: (Check all that apply)

☐ Acid Rain Unit

☐ CAIR Unit

☐ Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [8] of [8] EU008 – Fugitive Dust from Storage Piles, Paved and Unpaved Roads

Emissions Unit Control Equipment/Method: Control _ of _

1. Control Equipment/Method Description: **N/A**
2. Control Device or Method Code:

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: *	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment: ***Process rate not limited by Permit No. 1190042-001-AC.**	

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: **(various)**		2. Emission Point Type Code: **4**
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **F**	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: **77** °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: **0** feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)
15. Emission Point Comment:		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Industrial Processes; Mineral Products; Fugitive Emissions**		
2. Source Classification Code (SCC): **3-05-888-01**	3. SCC Units: **Tons Product**	
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: ***Process rate not limited by Permit No. 1190042-001-AC.**		

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			**NS**
PM10			**NS**

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

(Optional for unregulated emissions units.)

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

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **N/A**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? ☐ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions:	
11. Potential, Fugitive, and Actual Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions _ of _

1. Basis for Allowable Emissions Code: **N/A**	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):	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G 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: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **20%** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Not required**	
5. Visible Emissions Comment: **General VE**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code: **N/A**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ 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 [8] of [8] EU008 – Fugitive Dust from Storage Piles, Paved and Unpaved Roads

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ 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)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ To be Submitted, Date (if known):_____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☐ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

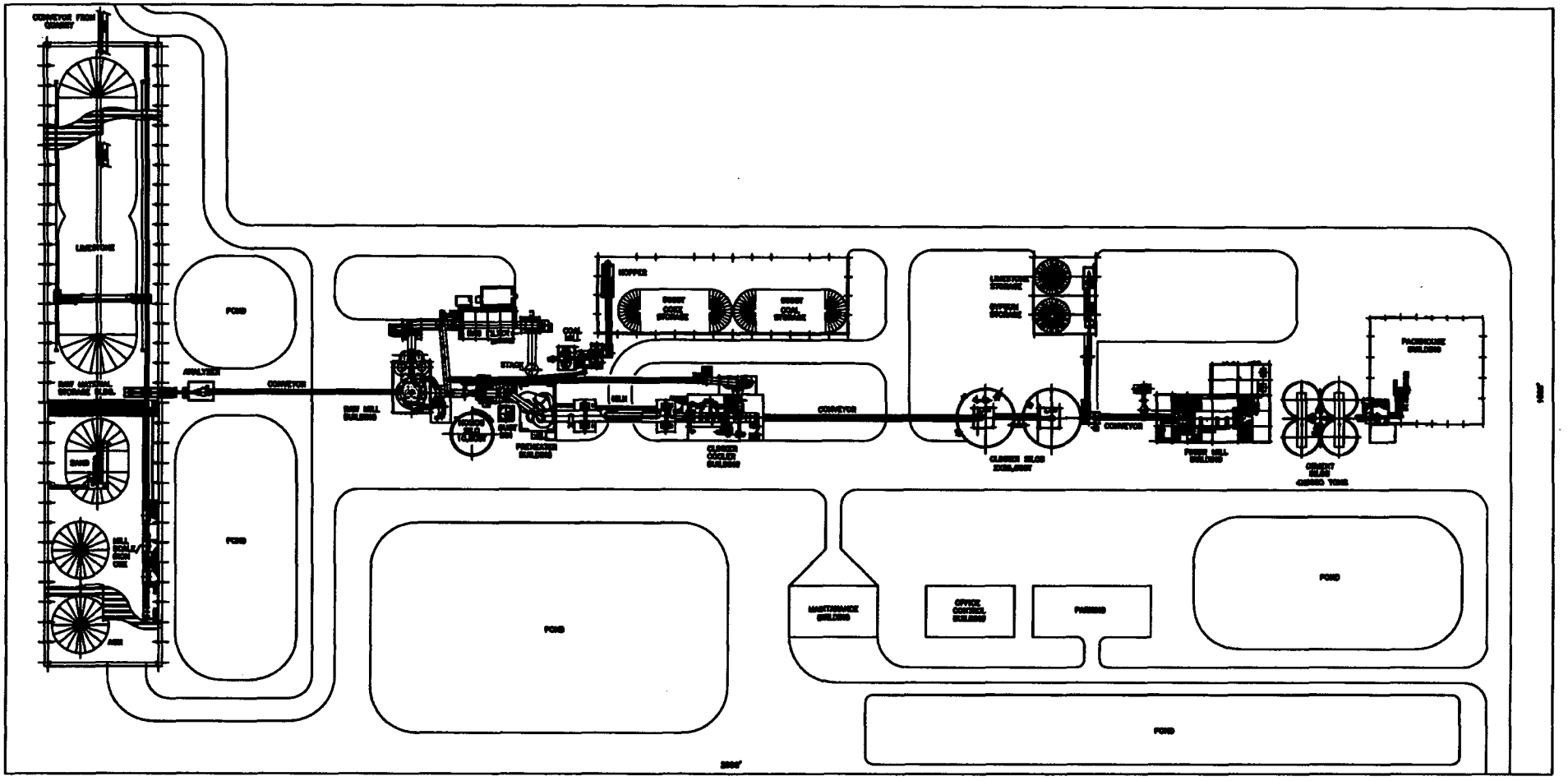
1. Identification of Applicable Requirements: ☐ Attached, Document ID: _____
2. Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements Comment

Attachments

Attachment

Facility Plot Plan



AUGUST 24, 2005

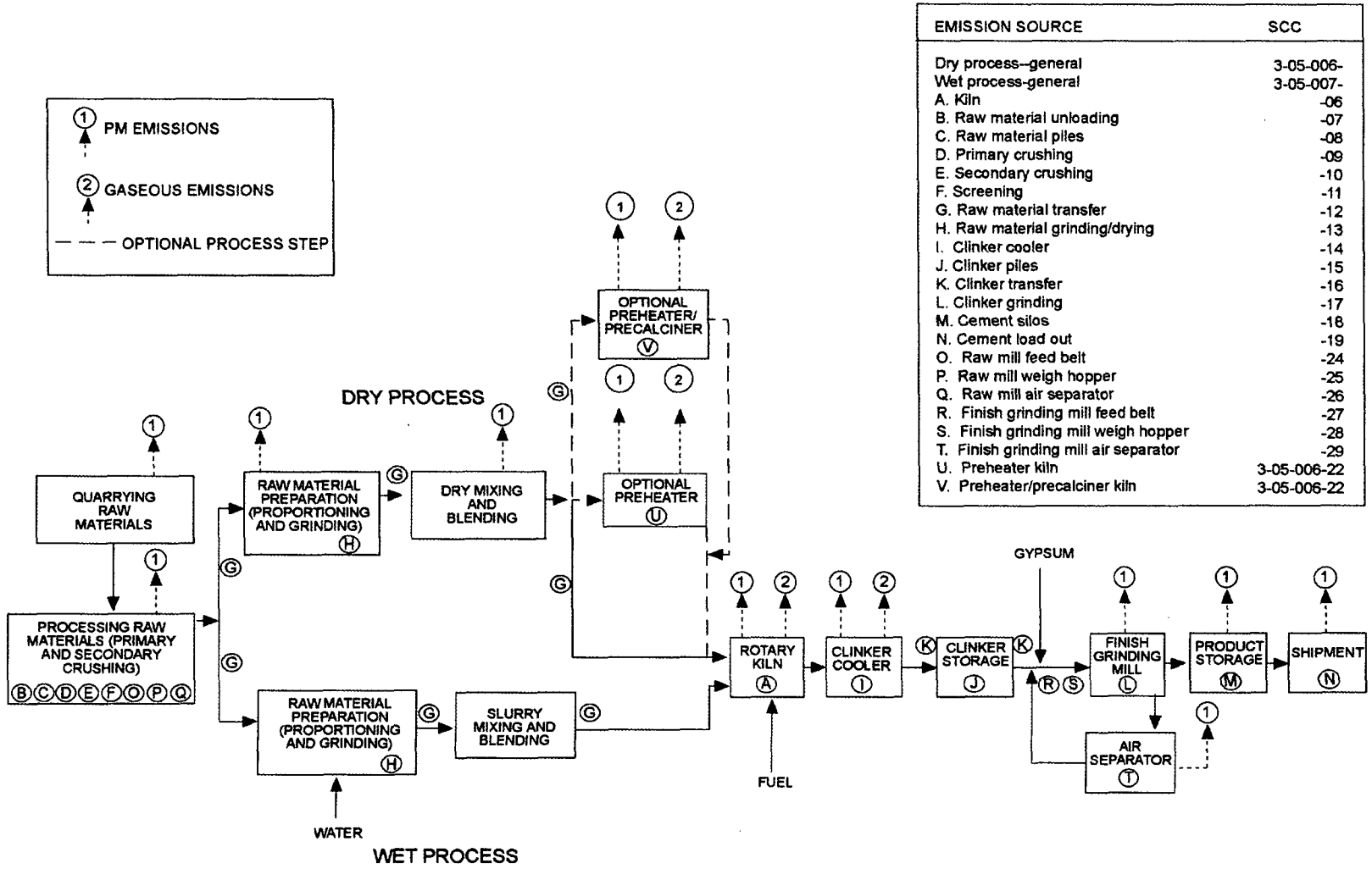
NATURAL RESOURCES OF CENT. FLORIDA
SUMTERVILLE, FLORIDA

PLANT LAYOUT
PLOT PLAN
PROPOSED KEY KILN LINE

E | 110.00.10-1131200

Attachment

Facility Process Flow Diagram



EMISSION SOURCE	SCC
Dry process--general	3-05-006-
Wet process-general	3-05-007-
A. Kiln	-06
B. Raw material unloading	-07
C. Raw material piles	-08
D. Primary crushing	-09
E. Secondary crushing	-10
F. Screening	-11
G. Raw material transfer	-12
H. Raw material grinding/drying	-13
I. Clinker cooler	-14
J. Clinker piles	-15
K. Clinker transfer	-16
L. Clinker grinding	-17
M. Cement silos	-18
N. Cement load out	-19
O. Raw mill feed belt	-24
P. Raw mill weigh hopper	-25
Q. Raw mill air separator	-26
R. Finish grinding mill feed belt	-27
S. Finish grinding mill weigh hopper	-28
T. Finish grinding mill air separator	-29
U. Preheater kiln	3-05-006-22
V. Preheater/precalciner kiln	3-05-006-22

Attachment. Facility Process Flow Diagram; American Cement Company, Sumterville Cement Plant
Koogler & Associates, Inc.
Source: AP-42, Figure 11.6-1

Attachment

Precautions to Prevent UPM

Precautions to Prevent UPM

Precautions to Prevent Emissions of
Unconfined Particulate Matter

Pursuant to Rules 62-212.400(BACT) and 32-296.320(4)(c), F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:

a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Such activities include, but are not limited to: vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling.

b) Reasonable precautions shall include the following:

1) Landscaping and planting of vegetation.
2) Application of water to control fugitive dust from activities such as demolition of buildings, grading roads, construction, and land clearing.
3) Water supply lines, hoses and sprinklers shall be located near all stockpiles of raw materials, coal, and petroleum coke.
4) All plant operators shall be trained in basic environmental compliance and shall perform visual inspections of raw materials, coal and petroleum coke periodically and before handling. If the visual inspections indicate a lack of surface moisture, such materials shall be wetted with sprinklers. Wetting shall continue until the potential for unconfined particulate matter emission are minimized.
5) Water spray shall be used to wet the materials and fuel if inherent moisture and moisture from wetting the storage piles are not sufficient to prevent unconfined particulate matter emissions.
6) As necessary, applications of asphalt, water, or dust suppressants to unpaved roads, yards, open stockpiles and similar activities.
7) Paving of access roadways, parking areas, manufacture area, and fuel storage yard.
8) Removal of dust from buildings, roads, and other paved areas under the control of the owner or operator of the facility to prevent particulate matter from becoming airborne.
9) A vacuum sweeper shall be used to remove dust from paved roads, parking, and other work areas.
10) Enclosure or covering of conveyor systems where practicably feasible.
11) All materials at the plant shall be stored under roof. Materials, other than quarried materials, shall be stored on compacted clay or concrete, or in enclosed vessels.
12) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
13) Confining abrasive blasting where possible.

c) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

Attachment

List of Insignificant Activities

List of Insignificant Activities

List of Insignificant Activities

The following sources are considered insignificant per Rule 62-213.430(6), F.A.C.:

- Facility-wide particulate matter fugitive emissions from miscellaneous activities, such as truck operations throughout the facility, wind erosion, etc.;
- Diesel fuel tanks;
- Fugitive VOC emissions from Kiln drive grease;
- General VOC usage for maintenance;
- Non-road diesel engines;
- Plant-wide painting;
- Portable welders;
- Process laboratory;
- Janitorial activities;
- Portable toilet facilities;
- Administrative support functions including printing and document preparation;

Rule 62-213.430(6), F.A.C.:

(6) Insignificant Emissions Units or Pollutant-Emitting Activities.

(a) All requests for determination of insignificant emissions units or activities made pursuant to paragraph 62-213.420(3)(n), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to this chapter. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of paragraph 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule.

(b) An emissions unit or activity shall be considered insignificant if all of the following criteria are met:

1. Such unit or activity would be subject to no unit-specific applicable requirement.

2. Such unit or activity, in combination with other units and activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in subparagraph 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s).

3. Such unit or activity would neither emit nor have the potential to emit:

a. 500 pounds per year or more of lead and lead compounds expressed as lead;
b. 1,000 pounds per year or more of any hazardous air pollutant;
c. 2,500 pounds per year or more of total hazardous air pollutants; or
d. 5.0 tons per year or more of any other regulated pollutant.

Attachment

Identification of Applicable Requirements - General

Applicable Requirements –
Facility Level

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- Chapter 62-4-Permits
- Chapter 62-204 Air Pollution Control - General Provisions
- Chapter 62-210 Stationary Sources - General Requirements
- Chapter 62-212 Stationary Sources - Preconstruction Review
- Chapter 62-213 Operation Permits For Major Sources Of Air Pollution
- Chapter 62-296 Stationary Sources - Emission Standards
- Chapter 62-297 Stationary Sources - Emissions Monitoring

Title 40 Part 60: New Source Performance Standards (NSPS)

- Subpart F: Standards of Performance for Portland Cement Plants (40CFR60.60)
- Subpart Y: Standards of Performance for Coal Preparation Plants (40CFR60.250)
- Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants (40CFR60.670)

Title 40 Part 63--National Emission Standards For Hazardous Air Pollutants For Source Categories
Subpart A--General Provisions
Referenced from Table 1 to Subpart LLL of Part 63
[59 FR 12430, Mar. 16, 1994]

- 63.1(a)(1)–(4)
- 63.1(a)(6)–(8)
- 63.1(a)(10)–(14)
- 63.1(b)(2)–(3)
- 63.1(c)(1)
- 63.1(c)(2)
- 63.1(c)(4)–(5)
- 63.1(e)
- 63.2
- 63.3(a)–(c)
- 63.4(a)(1)–(3)
- 63.4(a)(5)
- 63.4(b)–(c)
- 63.5(a)(1)–(2)
- 63.5(b)(1)
- 63.5(b)(3)–(6)
- 63.5(d)(1)–(4)

- 63.5(e)
- 63.5(f)(1)–(2)
- 63.6(a)
- 63.6(b)(1)–(5)
- 63.6(b)(7)
- 63.6(c)(1)–(2)
- 63.6(c)(5)
- 63.6(e)(1)–(2)
- 63.6(e)(3)
- 63.6(f)(1)–(3)
- 63.6(g)(1)–(3)
- 63.6(h)(1)–(2)
- 63.6(h)(4)–(h)(5)(i)
- 63.6(h)(6)
- 63.6(h)(7)
- 63.6(i)(1)–(14)
- 63.6(i)(16)
- 63.6(j)
- 63.7(a)(1)–(3)
- 63.7(b)
- 63.7(c)
- 63.7(d)
- 63.7(e)(1)–(4)
- 63.7(f)
- 63.7(g)
- 63.7(h)
- 63.8(a)(1)
- 63.8(b)(1)–(3)
- 63.8(c)(1)–(8)
- 63.8(d) Quality Control
- 63.8(e)
- 63.8(f)(1)–(5)
- 63.8(f)(6)
- 63.8(g)
- 63.9(a)
- 63.9(b)(1)–(5)
- 63.9(c)
- 63.9(d)
- 63.9(e)
- 63.9(f)
- 63.9(g)
- 63.9(h)(1)–(3)
- 63.9(h)(5)–(6)
- 63.9(i)

- 63.9(j)
- 63.10(a)
- 63.10(b)
- 63.10(c)(1)
- 63.10(c)(5)–(8)
- 63.10(c)(10)–(15)
- 63.10(d)(1)
- 63.10(d)(2)
- 63.10(d)(3)
- 63.10(d)(4)
- 63.10(d)(5)
- 63.10(e)(1)–(2)
- 63.10(e)(3)
- 63.10(f)
- 63.12(a)–(c)
- 63.13(a)–(c)
- 63.14(a)–(b)
- 63.15(a)–(b)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (a)
- 40 CFR 63.1340 (c)
- 40 CFR 63.1340 (d)

40 CFR 63.1341 Definitions.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002]

- 40 CFR 63.1341

40 CFR 63.1342 Standards: General.
[71 FR 76549, Dec. 20, 2006]

- 40 CFR 63.1342

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1349 (a)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1350 (a) (1)
- 40 CFR 63.1350 (a) (2)
- 40 CFR 63.1350 (b)
- 40 CFR 63.1350 (l)

40 CFR 63.1351 Compliance dates.
[71 FR 76552, Dec. 20, 2006]

- 40 CFR 63.1351 (b)

40 CFR 63.1353 Notification requirements.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1353

40 CFR 63.1354 Reporting requirements.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1354

40 CFR 63.1355 Recordkeeping requirements.
[64 FR 31925, June 14, 1999, as amended at 71 FR 76552, Dec. 20, 2006]

- 40 CFR 63.1355

40 CFR 63.1356 Exemption from new source performance standards.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16622, Apr. 5, 2002; 71 FR 76552, Dec. 20, 2006]
40 CFR 63.1356 (a)

Title 40 Part 98: Mandatory Greenhouse Gas Reporting

- Subpart A – General Provisions
- Subpart H – Cement Production

Attachment

Detailed Description of Control Equipment

Attachment
Detailed Description of Control Equipment

Baghouses:

Baghouse ID	Description	Exit Flow (acfm)	Exit Flow (scfm)	Cloth Area (ft^2)	Air:Cloth Ratio	Exit Temp (°F)	Plot Point	Control Efficiency (%)	ACC Tag Number	ACC ID	Model	No. of Filters
EU002	Raw Materials, Conveying, Storage, and Processing											
F10	Baghouse for raw meal transfer to air lift to homogenizing silo	1,000	--	205	4.9	200	F-10	99%	3J1.BF01	F-10	48TR8x16	16
G07	Baghouse for raw meal transfer to homogenizing silo	22,000	--	4,320	5.09	200	G-11	99%	3K1.BF02	G-11	15TR12x225	225
G10	Baghouse for homogenizing silo bin vent	3,000	--	627	4.8	200	G-10	99%	3K1.BF01	G-10	7TR12x49*	49
E38	Baghouse for filter dust surge bin	6,000	--	1,229	4.88	300	E-38	99%	4E1.BF01	E-38	8TR12x64	64
H08	Baghouse for raw meal transfer for homogenizing silo	1,000	--	205	4.9	200	H-08	99%	4C1.BF01	H-08	4TR8x16	16
EU003	Pyroprocessing System											
Main Baghouse	Preheater/kiln/cooler/raw mill through Main Stack	409,650	264,861	124,861	3.28	500	--	99%	4E1.PB01	E-19	--	--
EU004	Clinker and Additives Storage and Handling											
L03	Baghouse from clinker transfer cooler discharge	3,000	--	576	5.21	290	L-03	99%	4T1.BF01	L-03	15TR12x30	30
L06	Baghouse from clinker transfer to clinker silo #1	6,500	--	1,229	5.28	300	L-06	99%	4T1.BF02	L-06	8TR12x64	64
M08	Baghouse from clinker transfer to clinker silo #2	4,000	--	808	4.9	290	M-08	99%	4T1.BF03	M-08	6TR12x42	42
DC-1	Dust collector from clinker transfer from clinker silos (west)	353	--	54	6.56	200	--	99%	5E1.BF01	CD-1	--	4
DC-2	Dust collector from clinker transfer from clinker silos (east)	353	--	54	6.56	200	--	99%	5E1.BF02	CD-2	--	4
EU005	Finish Mill											
N-93	Finish Mill Air Separator	150,000	--	33,792	4.44	200	N-09	99%	5F1.PB02	N-09	110TR12x1760	1760
N-94	Finish Mill Sweep	40,000	--	8,909	4.49	230	N-12	99%	5F1.PB01	N-12	29TR12x464	464
EU006	Cement Handling, Storage, Packing, and Loadout											
N-91	Cement transfer from finish mill	8,000	--	1,556	5.14	200	N-81	99%	5F1.BF01	N-81	9TR12x81	81
Q-25	Cement Silo #1, #2, #3, #5	12,000	--	2,324	5.17	200	Q-25	99%	5K1.BF01	Q-25	11TR12x121	121
Q-26	Cement Silo #4	12,000	--	2,324	5.17	200	Q-26	99%	5K1.BF02	Q-26	11TR12x121	121
Q-14	Truck Loadout #1 (West)	3,000	--	627	4.8	200	Q-14	99%	6D1.BF01	Q-14	7TR8x49	49
Q-17	Truck Loadout #2 (East)	3,000	--	627	4.8	200	Q-17	99%	6D2.BF01	Q-17	7TR8x49	49
R-12A	Packhouse Bagging	12,000	--	2,324	5.17	200	R-12	99%	6G1.BF01	R-12	11TR12x121	121
EU007	Coal and Petroleum Coke Grinding System											
S-22	Coal/Petroleum Coke Mill Including Thermal Dryer (Two baghouses)	17500 (ea)	--	4474 (ea)	3.9 (ea)	200 (ea)	S-24	99%	CR1.PB01	S-24	12PRW233	233 (ea)
S-26	Coal/Petroleum Coke Bin	800	--	243	3.3	200	S-26	99%	CV1.BF01	S-26	8PRT19	19

Attachment

Startup, Shutdown & Malfunction Plan

American Cement Company
Sumterville, FL Plant

Startup, Shutdown & Malfunction (SSM) Plan

June, 2009

Table of Contents

1.0 INTRODUCTION

1.1 Purpose

The purpose of this plan is to ensure that affected sources and air pollution control and monitoring devices are operated and maintained in a manner consistent with the intended purpose of the equipment. In addition, the plan should ensure that malfunctions are corrected as soon as practicable after their occurrence, and also reduce the reporting burden associated with periods of startup, shutdown, and malfunction.

This plan, as required by 40 CFR 63.6 (e)(3), includes the following:

- Procedures for operation and maintenance during periods of startup, shutdown, and malfunction, for affected sources.
- Establishes a program of corrective action for malfunctioning process and air pollution control equipment that is used to comply with the relevant standard.
- As required by 40 CFR 63.8(c)(1)(i), A separate Operation & Maintenance Plan has been developed to detail the start up, shutdown and malfunctions requirements for the continuous emission monitoring system (CEMS) and the continuous opacity monitoring (COMS) installed at the facility.

1.2 Identification of Affected Operating Systems

During periods of startup, shutdown, and malfunction, the affected source shall be operated and maintained including associated air pollution control or monitoring equipment in accordance with the procedures specified in this plan. This plan applies to the following processing systems:

- Raw Material Storage & Handling System
- Raw Mill System
- Homogenizing Silo Storage System
- Coal Mill System
- Kiln System
- Clinker Cooler & Handling System
- Additive Storage & Handling System
- Finish Mill System
- Packaging System
- Bulk Storage and Loading System

1.3 Definition of Terms

Startup is a planned or scheduled event during which a process system is activated. This excludes starts of normally intermittent operations (i.e. lunch or break periods for equipment that is manually operated, bulk loading or unloading operations, etc.)

Shutdown is a planned or scheduled event, during which a process system is stopped. This excludes stops of normally intermittent operations (i.e. lunch or break periods for equipment that is manually operated, bulk loading or unloading operations, etc.)

Malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner.

2.0 OPERATION and MAINTENANCE DURING STARTUP

2.1 Startup Conditions

Operational throughputs greater than the following levels represent startup for the systems, as listed:

System	"Startup" Throughputs (TPH)
1. Raw Material Handling	70
2. Raw Mill System	70
3. Homogenizing Silo Storage System	140
4. Coal Mill System	14
5. Kiln System	86
6. Clinker Cooler & Handling System	86
7. Additive Storage & Handling System	4
8. Finish Mill System	60
9. Packaging System	54
10. Bulk Storage & Loadout Systems	155

2.2 Startup Operating Procedures

During startup, an automated computerized process control system is used, in conjunction with "local" controls to start and stop process equipment. Manual switches at the location of the equipment may also be used to locally startup the equipment.

Each system listed above in Section 2.1 consists of multiple components which are electronically interconnected and/or interlocked in groups within the system. The process control system and local on/off controls are designed and used to sequentially start the equipment within each system in a specific logical order. Equipment startup by the process control system is configured to minimize the potential of excess emissions,

material spills and plugging. This approach minimizes the need for cleanup and the generation of fugitive particulate emissions.

The computerized process control system is designed with logic that will ensure the prescribed startup sequences are followed each time a process system and/or the pollution control equipment is started. Air pollution control devices are operating throughout startup and shutdown events. In the sequence of process startup; the associated pollution control equipment will be the first component to startup and the last component to be shutdown.

2.3 Process System Startup

The starting of a processing system is typically divided into starts for functional areas designated as "group" and there are prescribed startup conditions that must be met before the system and/or the groups can be started. For example, the multiple pieces of equipment within a mill processing system can be divided into transport, lubrication, grinding, and feed group starts. The operator, through the computer controlled system, can sequentially activate each of the individual groups during startup. The system components are electronically interlocked to prevent startup of a piece of process equipment before activation of any related air pollution control device. As each group or piece of equipment is started, the specified startup and/or operating conditions for the group must be achieved prior to the startup of additional groups or equipment. These required conditions may include feed rate, temperature, pressure or motor current. The majority of the startup/operating conditions have preset high and low limits that will automatically alert the operator to abnormal conditions in the system and/or shut down the equipment when these limits are exceeded.

Equipment operators, process attendants and maintenance personnel are routinely checking or monitoring the equipment and process throughout each operation day. They will also perform prescribed maintenance and inspections during equipment operation and during scheduled downtime periods. The process systems operating monitoring devices may include motion detectors, tilt switches, photo eyes, weight feeders/scales, temperature sensors and pressure sensors. These sensors are continuously sending data to the process control system to be archived and entered into various reports which track process indicators for throughput levels and equipment performance.

3.0 OPERATIONS and MAINTENANCE DURING SHUTDOWN

3.1 Shutdown Conditions

For the purpose of this plan, shutdown occurs when the process/equipment throughput is at the following levels or the power to the process/equipment has been turned off. At or below these levels the operational efficiency would preclude process operation.

System	"Shutdown" Throughputs (TPH)
1. Raw Material Storage & Handling System	70
2. Raw Mill System	70
3. Homogenizing Silo Storage System	140
4. Coal Mill System	14
5. Kiln System	86
6. Clinker Cooler and Handling System	86
7. Additive Storage & Handling System	4
8. Finish Mill System	60
9. Packaging System	54
10. Bulk Storage and Loadout Systems	155

3.4 Shutdown Operating Procedures

During shutdown periods, an automated computer ("control") system is used, in conjunction with "local" controls. Manual switches at the location of the equipment that may be used once the control system has the process equipment to "local operation".

Each of the processing systems listed above in Section 3.1 consist of multiple components. Each of the components within a processing system is electronically connected. The control system and local controls are designed and used to sequentially shutdown pieces of equipment within a processing system in a specific order.

Shutdown within a process by the control system is configured to minimize the potential of material buildup, spills, plugging and aid in equipment re-start. This approach minimizes the need for cleanup and fugitive particulate emissions. For example, a feeder placing material onto a conveyor; would be shutdown prior to shutting down the conveyor. This practice reduces the potential for air emissions by minimizing spillage and/or plugging of transfer and input points. During a controlled shutdown, process material flow may have to be slowly reduced to a minimal or zero output. This will allow feed/conveying systems to reduce or empty out material loads. This will minimize the potential for plugs and overflows during shutdown and allows for a more controlled and efficient startup.

The computer control system and local on/off controls are designed and utilized to ensure that air pollution control devices are operating during process operation and shutdown event, after the shutdown of the associated equipment.

3.5 Emission Control Equipment Shutdown

The process of shutting down a processing system is typically divided into groups for functional areas. For example, the multiple pieces of equipment within a raw mill processing system can be grouped into transport, lubrication, grinding, and feed. The operator sequentially de-activates each of the individual groups during a shutdown for a processing system. Typically the emission control system is electronically interlocked with the last group or piece of equipment that is shutdown; to prevent shutdown of an air pollution control device before shutdown of a related piece of process equipment. The pollution control device will operate throughout the shutdown procedure and will be shutdown only after the entire process or group that it controls has been shutdown. In most cases the control equipment will operate for a prescribed time after the process has shutdown. This is sometimes needed to cool down the process or equipment as a matter of practice or to prepare for maintenance activities.

Should the pollution control equipment malfunction, the process must be shutdown as expeditiously as possible. In the case of large compartmentalized control devices, the device may have to operate after the malfunction to isolate the individual compartment affected. When excess opacity is present on such units, the efficient repair may dictate that the unit continues to operate until the compartment or compartments with the problem can be isolated.

Loss of production is no excuse to circumvent the shutdown of a process due to a control unit malfunction. However, the shutdown of the process may be controlled to prevent material plugs and overflows and/or equipment damage.

4.0 OPERATION and MAINTENANCE DURING MALFUNCTIONS

4.1 Process System Malfunction

A malfunction is defined herein as a sudden, infrequent, and not reasonably preventable failure of a piece of air pollution control equipment or a process to operate in a normal or usual manner. Accordingly, these events are unplanned and unscheduled.

If a malfunction of a process system requires shutdown of the source, that shutdown will be managed according to the procedures outlined in Section 3 of this document.

If a malfunction of an affected source or its associated air pollution control equipment results in emissions exceeding those allowed by 40 CFR 63 Subpart LLL, then corrective action must be initiated immediately.

4.2 Alarmed Malfunctions

When a 3-hour average main baghouse inlet temperature limit is exceeded, the Data Acquisition Handling System will cause an alarm condition in the control room. The control room operator, upon receiving the alarm, will assess the operating conditions of the process system to determine the cause of the excess temperature and make process adjustments to maintain the inlet temperature below the limit.

When a 6-minute opacity limit for the main baghouse is exceeded, the Data Acquisition Handling System will cause an alarm condition in the control room. The control room operator, upon receiving the alarm, will assess the operating conditions of the process system and/or the baghouse to determine the cause of the excess opacity. The control room operator is responsible for initiating corrective action including, but not limited to, the following:

- Requesting another employee to further investigate the situation;
- Contacting a Production Supervisor who initiates a work order for the problem to be corrected, and/or contacts maintenance personnel.
- Any other action deemed necessary to correct the problem.

4.3 Other Affected Sources

When process equipment on the homogenizing silos, kiln feed system, clinker handling system or finish mills ceases to operate because of a failure or other alarmed malfunction, the automated control system will activate an alarm in the control room. The control room operator, upon receiving the alarm, will assess the operating conditions of the process system to determine the cause of the equipment malfunction or failure. The control room operator is responsible for initiating corrective action including, but not limited to, the following:

- Requesting another employee to further investigate the situation;

- Contacting the Production Supervisor who initiates a work order for the problem to be corrected, and/or contacts maintenance directly.
- Any other action deemed necessary to correct the problem.

4.4 Conveying System

When an equipment/process monitoring or control device on a conveying system ceases to operate because of a motor failure or other alarmed malfunction, the automated control system will cause an alarm to be sounded in the control room. The control room operator, upon receiving the alarm, will assess the operating conditions of the process system to determine the cause of the equipment failure. The control room operator is responsible for initiating corrective action including, but not limited to, the following:

- Requesting another employee to further investigate the situation;
- Contacting a Production Supervisor who initiates a work order for the problem to be corrected, and/or contacts maintenance directly;
- Any other action deemed necessary to correct the problem.

4.5 Non-Alarmed Malfunctions

Certain types of malfunctions will not generate an alarm in the control room. These malfunctions include: holes in dust collector bags in sources other than those equipped with COMS, or bag leak detectors; holes or other openings in venting, ductwork, or other enclosed systems; improper operation or failure of equipment in areas that may generate fugitive emissions.

These types of malfunctions cannot typically be corrected by the computerized process control system. Plant personnel who are trained to notice abnormal particulate emissions most often detect these malfunctions during routine inspection or general plant activities.

The control room operator once aware of the malfunction is responsible for initiating corrective action including, but not limited to, the following:

- Requesting another employee to further investigate the situation;
- Contacting a Production Supervisor who initiates a work order for the problem to be corrected, and/or contacts maintenance directly;
- Any other action deemed necessary to correct the problem.

4.6 Cement Silos, Packaging System & Bulk Loading

When a process control device on a bagging system ceases to operate correctly because of a malfunction, the operator notices the problem because of excessive dust in the area. The operator will then will assess the process system to determine the cause of the excess opacity. The operator is responsible for initiating corrective action including, but not limited to, the following:

- Requesting another employee to further investigate the situation;

- Contacting the Production Supervisor who initiates a work order for the problem to be corrected, and/or contacts maintenance directly;
- Any other action deemed necessary to correct the problem.

4.7 Process Control System Malfunction

The computerized control system is designed with a UPS (Uninterrupted Power Supply) protection system for short-term loss of power and/or electrical surges. In addition, the system has redundant computers so that if one computer fails, other computers/servers would be immediately available. Losing operational control by the process control system is unlikely. Although, in the event the operational control is lost all equipment will shutdown simultaneously.

4.8 Continuous Monitoring Systems

Corrective actions will be immediately implemented upon detection of a malfunction the Continuous Emission Monitoring or one of the Continuous Opacity Monitoring Systems malfunction and repairs will completed as expeditiously as possible.

4.9 Monitor Out of Control Condition

CEMS/COMS zero and high-level calibration drift is checked and calculated daily with excessive drift resulting in an "out-of-control condition (OC).

The beginning of the out-of-control period is the hour that a calibration drift check fails. The end of the out-of-control period is the hour following completion of successful calibration. Monitoring data collected during an out-of-control" period can not be used for compliance demonstration and the period of OC will be counted as monitor down time.

Performance Evaluations of the CEMS/COM system will be routinely conducted and may consist of the following:

a. Error Assessment
b. Zero and Span Drift Checks
c. Evaluation of Microprocessor/Analog Output
d. Optical Alignment Checks
e. Optical Boundary Contamination
f. Quarterly Certified Filter Performance Audit
g. Quarterly Protocol Gas Audit

5.0 RECORDKEEPING / REPORTING PROCEDURES

5.1 Record Keeping

This Startup, Shutdown, Malfunction Plan will be available for inspection, upon request. In addition, if the startup, shutdown, and malfunction plan is revised, the previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan will be maintained and available for inspection, upon request, for a period of 5 years after each revision to the plan.

The following record keeping methods will be used to document startup and shutdown occurrences for the corresponding systems:

System	Recordkeeping
Raw Material Storage & Handling System	Historian* / Record of Equipment **
Raw Mill System	Historian* / Record of Equipment **
Homogenizing Silo Storage System	Historian* / Record of Equipment **
Coal Mill System	Historian* / Record of Equipment **
Kiln System	Historian* / Record of Equipment **
Clinker Cooler & Handling System	Historian* / Record of Equipment **
Additive Storage & Handling System	Historian* / Record of Equipment **
Finish Mill System	Historian* / Record of Equipment **
Cement Packaging System	Historian* / Record of Equipment **
Bulk Storage & Loading Systems	Historian* / Record of Equipment **

* SSM that do not create permit exceedance.
** SSM that results in exceedances.

The following records will be maintained for a period of 5 years:

a. Records regarding the occurrence and duration of each startup, shutdown, or malfunction of equipment or process system will be documented by Historian, the process control recordkeeping system. Any air compliance exceedances that occur during a start-up, shutdown, or malfunction will be recorded on the Record of Equipment SSM. (see Attachment 1);

b. Records regarding maintenance performed for each malfunction of the air pollution control equipment (see Attachment 2);

c. Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual mode of operation) when such actions are **inconsistent** with the procedures specified in this plan (see Attachment 3, Inconsistent Actions of Equipment SSM);

d. Each period during which a CEMS or COMS is malfunctioning or inoperative (including out-of-control periods) are recorded on the Semi-Annual Downtime Report.

5.2 Reporting

5.2.1 Action Consistent With SSM Plan

When actions taken by the owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in this plan, records will be maintained for that event to demonstrate that the procedures specified herein were followed. Work Order Request as found in Attachment 2, and automated maintenance records will be used to confirm conformance with the startup, shutdown, and malfunction plan.

A semi-annual report will be submitted that actions taken during the previous 6-months during periods of startup, shutdown, and malfunction were consistent with the startup, shutdown and malfunction plan, as required by §63.10(d)(5).

5.2.2 Action Inconsistent With The SSM Plan

Actions inconsistent with the Startup, Shutdown, Malfunction Plan

If an action taken during a startup, shutdown, or malfunction period (including an action taken to correct a malfunction) is not consistent with the procedures specified in this plan, that action shall be recorded and reported within 2 working days after they are commenced, followed by a letter within 7 working days after the end of the event, in accordance with §63.10(d)(5). Unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator [see §63.10(d)(5)(ii)].

Only a limited number of trained employees, primarily the Process Engineer, can reconfigure a process system start/stop sequence. Should reconfiguration be required that is not consistent with the normal equipment operating procedures, this would be considered a deviation from the Startup, Shutdown and Malfunction Plan. All such deviations would be subject to the reporting requirements specified above.

5.2.3 Continuous Opacity Monitoring System Reporting

a. If SSM plan is followed and the COMS is repaired immediately, this action shall be reported in the semi-annual startup, shutdown, and malfunction report 40 CFR 63.10 (c)(1)(i) and 63.10 (d)(5)(i).

b. If SSM plan is not followed, a report of the actions taken must be submitted (faxed) within 24-hours after commencing actions that are inconsistent with the plan. Follow-up detailed report due within 2 weeks. 40 CFR 63.10 (c)(1)(ii)

c. Information concerning "out-of-control" periods (including start and end dates/hours and description of corrective actions) must be submitted in the excess emissions and continuous monitoring system report specified in 40 CFR 63.10(e)(3).

6.0 PLAN REVISIONS

6.1 Revisions

The Startup, Shutdown, Malfunction Plan will be revised whenever the plan:

a. Does not address a startup, shutdown, or malfunction event that has occurred;

b. Fails to provide for the operation of the source (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

c. Does not provide adequate procedures for correcting malfunctions of process and/or air pollution control equipment as quickly as practicable.

Record of Equipment Startup, Shutdown and Malfunction
American Cement - Sumterville, FL
Attachment 1

Date: _____ Equipment Name : _____
Begin Time: _____ Equipment Number: _____
End Time: _____

Raw Material Raw Mill Homogenizing Silo Coal Mill Kiln Clinker Handling Additive Handling Finish Mill Packaging Bulk Loadout (Circle Affected System)

_____Planned Equipment Startup
_____Planned Equipment Shutdown

Were normal procedures followed for starting/shutting down equipment?

_____Yes _____No. If no, explain and forward report to Environmental Manager within 24 hours.

_____Unplanned Equipment Shutdown

Were normal procedures followed for unplanned equipment shutdown?

_____Yes _____No. If no, explain and forward report to Environmental. Manager within 24 hours.

_____Equipment Malfunction

Was corrective action initiated? _____Yes _____No

If corrective action was initiated describe below; include work order number.

ATTACHMENT 2

AMERICAN CEMENT COMPANY

Work Order Request

Date: _____

Requested By: _____

Equipment Number: _____ **Equipment Name:** _____

Department:

Mechanical	☐
Electrical	☐
Instrumentation	☐
Yard	☐
Quarry	☐

Priority:

Emergency	☐
Urgent	☐
Scheduled	☐
Safety	☐

Description of work to be done (*must be filled out by person requesting work*):

_____

_____

_____

_____

_____

Materials Needed:

_____

_____

_____

_____

_____

_____

_____

Estimated cost of job (*filled out by person estimating work*):

_____

_____

_____

_____

_____

Approved By: _____

Inconsistent Actions of Equipment Startup, Shutdown and Malfunction
American Cement - Sumterville, FL
Attachment 3

Date: _____ Equipment Name : _____
Begin Time: _____ Equipment Number: _____
End Time: _____

Raw Material Raw Mill Homogenizing Silo Coal Mill Kiln Clinker Handling Additive Handling Finish Mill Packaging Bulk Loadout (Circle Affected System)

_____Planned Equipment Startup
_____Planned Equipment Shutdown

What abnormal procedures were followed for starting/shutting down equipment?

Explain and forward report to Environmental Manager within 24 hours.

_____
_____
_____
_____

_____Unplanned Equipment Shutdown

What abnormal procedures were followed for unplanned equipment shutdown?

Explain and forward report to Environmental. Manager within 24 hours.

_____
_____
_____

_____Equipment Malfunction

What abnormal procedures were followed for correcting equipment malfunction?

_____
_____
_____

Attachment

O&M Plan

AMERICAN CEMENT COMPANY

Sumterville, FL
Cement Plant

Facility Operation & Maintenance Plan

Section **Page No.**

Attachments

Introduction

1.1. Scope of Plan

This operation and maintenance plan ("Plan") has been prepared for compliance with the requirements of 40 CFR 63.1350 (a). Facilities that are subject to ***40 CFR 63 Subpart LLL***, which is the MACT Standard for Portland Cement Plants, must prepare and comply with a written operations and maintenance plan for affected sources. The MACT standards are industry specific USEPA emission control standards and the cement industry standards are referred to as PCMACT. The Plan covers the entire facility, cement plant and quarry. The raw materials from the quarry typically contain sufficient moisture to maintain visible emission compliance with material crushing and transfer and handling visible emission standards. *"Furthermore, the first conveyor transfer point subject to this subpart is the transfer point associated with the conveyor transferring material from the raw material storage to the raw mill, §63.1340 (c). Failure to comply with any provision of the operation and maintenance plan developed in accordance with paragraph (a) of this section shall be a violation of the standard", §63.1350 (b).* Excerpts of 40 CFR 63 Subpart LLL can be found in Attachment 1.

1.2. Facility Description

This facility, which includes a Portland cement manufacturing plant and a surface mine, is owned and operated by American Cement Company, LLC (ACC).

The manufacture of Portland cement primarily involves the crushing, grinding, and blending of limestone, clays and other raw materials into a chemically proportioned mixture which is heated in a rotary kiln to extremely high temperatures to produce clinker nodules. The clinker is cooled and ground, with a small quantity of gypsum, to produce finished cement. ACC uses coal, whole scrap tires, diesel fuel and used oil as fuel sources for the kiln system. The primary/operating kiln fuel is pulverized coal. The air heater will be fired with diesel fuel and used oil.

2.0 Operation & Maintenance Procedures

2.1. Operational Procedures

Facility operation shall be in accordance with the prescribed procedures of the equipment manufactures, suppliers and those typical for a cement manufacturing facilities. The process equipment and air pollution control devices (see Attachments 2, Air Pollution Control Devices) included in this plan are incorporated into the plant equipment preventative/predictive maintenance program. Equipment maintenance and inspections are scheduled and conducted routinely, throughout the year, in accordance with the PM program. Records of maintenance

repair and inspection activities are captured in the work order section of maintenance. The equipment maintenance inspections will insure proper operation, and maintenance when needed, of all process and air pollution control devices. *Furthermore, operations personnel will also routinely perform the required visible emissions inspection of the control devices that are not equipped with continuous opacity monitoring systems (COMS) and other affected sources.*

The kiln system baghouse inlet temperature and coal mill exit temperature will be monitored according to § 63.1350 (f). The continuous temperature monitors shall meet the requirements of 63.1350 (f)(1) through (f)(6) and monitor the 180 minute rolling average temperature. These thermocouples will be changed out on a quarterly (main baghouse) or annual (coal) basis using manufacturer calibrated thermocouples, or thermocouple certified by a lab to NIST standards.

The kiln system baghouse exhaust is monitored by a continuous emission monitoring system, (CEMS) and continuous opacity monitoring system (COMS). The CEMS and COMS record and tabulate emissions and monitoring data which is reported to the regulatory agency as required by the Title V permit. Reasonable precautions will be taken to minimize fugitive emissions throughout the facility. All employees are encouraged to be aware of fugitive sources of emissions, report them and to follow-up with corrective action measures as soon as practical; to abate the emissions.

2.2. Maintenance Procedures

An inspection and preventive maintenance (PM) program will be established for all emission control units and process equipment components in the plant PM/work order program. The preventive maintenance protocols are the established equipment inspection schedules, procedures implemented as a result of the ACC PM process and manufacturer's recommendations; wherein proper operation of process equipment and emission control devices is ensured via routine inspections and maintenance activities. Emission control device inspection include such items as inspection of air cleaning systems, checking the system for proper lubrication, damper or flop gate operation, cleaning cycles, dust removal and pressure drop indications. In addition to, routine preventive maintenance inspections, production personnel will conduct daily VE inspections, Method 22, on the dust collectors for the finish mill and finish mill separators and monthly Method 22 observations will be conducted for all other dust collectors; with a reduced frequency as provided in 40 CFR 63 Subpart LLL. Process dust collectors, in most cases, are interlocked with process they control and typically will start up prior to or as the process is started and to run a sufficient amount of time after process shut down or feed is discontinued. The process control system software is Polcid, a software package designed by Polysius; who designed the facility and provided all of the major process components. This software package provides the feed back from I/O points throughout the plant and these inputs provide information needed for process optimization, PM activities and to minimize process upsets and/or failures.

The plant maintains a supply of critical and consumable replacement spare parts for process equipment dust collectors; in operating inventory. Dust collector bags are included as spare

parts. In accordance with 40 CFR 63.1350 (a) (3), ACC will conduct an annual inspection of the combustion system components of the kiln system. The checklist in Attachment 3, or similar documentation, will be utilized as a record of the annual combustion system inspection.

3.0 Visible Emission Monitoring Procedures

3.1. Monthly Visible Emission Monitoring

Once per calendar month visible emissions tests, Method 22, will be conducted on the potential emission points indicated in Attachment 1. Testing will be conducted during daylight hours with the source in normal operation. These reports shall be maintained on file for a minimum of five years. Monitoring frequency will reduced as provided in *§63.1350 (a) (4), (ii), (iii) and (iv).*

Flow Chart No. 1, Monthly Emission Unit Monitoring Procedure, Attachment 4 depicts the steps for Monthly VE monitoring, follow-up and corrective action; needed for potential fugitive dust points requiring monthly 1 – minute VE monitoring. The results of each month's observations are recorded on a *Monthly Visible Emissions Inspection Report Form* (see Attachment 5). In accordance with the provision of the permit, the frequency of monitoring will be reduced as applicable to the successive negative (no visible emissions) monitoring events recorded for each source.

If a source has no visible emission, using Method 22, for six (6) consecutive months the testing frequency may be reduced from monthly to semi-annually. If no visible emissions are observed during the semi-annual observations; testing may be decreased to annually. A positive VE on any source requiring Method 22 observation will return that source to monthly observations requirements 40 CFR § 63.1350 (a) (4), (i),(ii).

3.2. Daily Visible Emission Monitoring

Flow Chart No. 3, Dai*ly Emission Unit Monitoring Procedure*, Attachment 6 depicts the steps for daily VE monitoring, follow-up and corrective action; needed for points requiring daily *6 – minute* VE monitoring. The results of the daily observations are recorded on a *Daily Visible Emissions Inspection Report Form* (see Attachment 7). A daily one 6 - minute Method 22 observation must be conducted on the finish mill and finish mill separator dust collectors.

3.3 Visible Emission Observation

3.3 Visible Emission Observation

The opacity/visible emission (VE) allowable for all baghouses, other than the kiln system baghouse, is five (5) percent. Opacity is essentially a measurement or indication of the amount of light obscured/scattered by particles in the exit gas stream and in the case of an observer, the amount of background obscured by the particles. The measurement of opacity is either made by an in stack-monitoring device or by the unaided human eye, for baghouse opacity determinations it will be the latter, except for the kiln system baghouses. Opacity is measured over a range of zero (0) to one hundred (100) percent. A certified observer can make opacity determinations over a wide percentage range. However, observations in the ten (10) percent and below range can be very subjective. Furthermore, when observing opacity in the lower, <10%, ranges; factors such as sunlight, background color, and the position of the observer relative to the source can greatly bias the results.

A baghouse system will usually lack sufficient moisture/water vapor to cause a steam/condensate plume, except for finish mill and the kiln system baghouse, when the correct atmospheric conditions exist. Otherwise a baghouse should have virtually no visible emissions (VE) from the discharge point. However, even with low moisture in a hot stack gas, there can be a detached steam plume during ambient conditions of cold temperature and sufficient humidity. Otherwise, the baghouse discharge will remain clear (no VE) unless there is a failure in the filter medium resulting in a leak between the clean and dirty sides of the unit. When there is a steam plume present the opacity, if any, should be read at a point after the steam has dissipated. With a detached plume, steam forms beyond the discharge point, if sufficient space is available between the discharge point and the steam plum you may read opacity at the point of discharge.

Compliance of a point source with an opacity standard is determined by Method 9 observation or a COMS; averaging readings over a six minute observation period. In the case of a Method 9 observation, a 30 minute or 60 minute observation period will allow the observer to detect potential changes in opacity due to process variations and/or bag cleaning events; particularly for pulse-jet baghouses. It is not out of the ordinary to see an increase in opacity after a cleaning event takes place even with the system in good condition. However, this increase sometimes may not be perceptible by an observer. Method 22 is used only to establish the presence of visible emissions, not the percent of opacity.

Method 22 is used only to determine the presence of visible emissions and not the percent opacity, therefore; observer certification is not required to conduct the Method 22 observations. An employee familiar with the process, the principles of baghouse operation and the Method 22 procedure can perform the observation. Prior to beginning the Method 22 observation, verify that the source to be observed is in operation; under normal conditions. As soon as possible after determining that the source is operating normally, begin conducting the one-minute or 6-minute Method 22's; only observing one source at a time.

The observer should position themselves a minimum of fifteen (15) feet from the emission point, when practical, and where the sun is not directly in the eyes of the observer and preferably within

a 140 sector of the observers back when they is facing the emission point. It is best if the observer is perpendicular to the plume. Where this is not practical, keep the line of sight angle to 45 degrees or less. Read one plume at a time and do not attempt to read a plume through another plume or dust from other sources. Once in position, fill out the observation form and note the start time and then observe the emission point continuously for required period of time, 1-minute or 6-minutes, and note the end time of the observation. If there is break in the observation period, note the time of the break and a new start time when the observation starts again to complete the observation period, 1-minute or 6-minute. At the end of the observation, the observer will verify that all sources observed operated continuously during the observation period. If any of the sources stopped or shut down operation during the observation period, another Method 22 must be completed for the source after it re-starts. For operating purposes, if a unit operates for any portion of a day it is considered an operating day and the daily observation must be completed for the unit. The required VE observations must take place if the source operates for any portion of a day. You should try to get the observation completed as early in the operating day as possible; after sun rise. *No observations for Method 22 or Method 9 may be conducted during the nighttime hours.* The requirements for conducting the monthly 1-minute Method 22's does not apply to a "totally enclosed" conveying system transfer point. A totally enclosed transfer point is defined as *"a conveying system transfer point that is enclosed on all sides, top, and bottom"*.

If visible emissions are observed during a 1 or 6-minute Method 22 (see Flow Chart No. 1 for monthly monitoring, and Flow Chart No. 2 for the Finish Mill DC's, daily monitoring) the observer must note the positive reading and initiate corrective action "***within one-hour***" of the positive observation and conduct a follow up Method 22 within 24 hours. If visible emissions are observed during the follow-up Method 22, a 30-minute Method 9 observation must be conducted for dust collectors and a 6 – minute Method 9 for all other affected sources; by a certified observer, with a current certification. If the Method 9 test indicates that the source is in compliance with the 5% limit for dust collectors and 10% for other affected sources, a negative observation Method 22 observation will be recorded and the observer will return to the normal VE monitoring schedule. If the Method 9 indicates that the source is exceeding the opacity limit, an exceedance shall be recorded on the semi-annual compliance report for the source. Corrective action must be initiated immediately. Daily 30-minute Method 9 tests will be conducted until the corrective actions reduce the opacity to less than the opacity limit (5% or 10%); whichever is applicable. When the Method 9 test verifies compliance, you may return to the normal Method 22 VE monitoring schedule. *At least one person at the facility will be certified to perform Method 9 observations.*

"Failure to eliminate the opacity exceedance within 24 hours shall constitute an ***excursion***"; which must be reported to the regulatory agency in the semiannual report.

4.0 Corrective Action Procedures

4.1. Corrective Action

If visible emissions are observed during an inspection, the Corrective Action Log (see Attachment 8) shall be completed to document corrective actions; as needed to supplement the VE inspection forms. Any work orders resulting from the corrective action should be attached to the corrective action log and both should be submitted to the Environmental manager. The Corrective Action Log should be completed each time corrective action takes place

4.2. Corrective Action Procedures

The person making the Method 22 visible emissions observation is responsible for initiating corrective action when a positive reading is noted on the inspection form. The observer will record the time corrective action began (corrective action must be initiated within one hour of the time of the observation of visible emissions). Corrective action begins with the notification of the appropriate supervisor, work begins to correct the problem or a work order is generated. The time that notification is given to the supervisor, work begins or the when the work order is generated must be noted on the VE inspection form. The person responsible for documenting the corrective action will attempt to identify the source and/or cause of the visible emissions. The problem should be corrected as quickly as practical, without shutting down the process, if possible. If the problem can not be corrected without shutting down the process, *the process must be shut down* to correct the problem.

On day 2, within 24 hours of the end of the Method 22 test in which visible emissions were observed, conduct a follow-up Method 22 test. If visible emissions are observed during this follow-up test, conduct a 30-minute (for dust collectors) or a 6-minute (other affected sources) visible emissions observation, as applicable, in accordance with Method 9. When testing is complete, the observer will verify that the equipment was running during the test. If the equipment stopped operation during the test, the test must be repeated when the equipment is restarted.

If the Method 9 test indicates that the dust collector is in compliance with the 5% opacity limit (less than or equal to $\leq$5%), a negative observation will be recorded Method 22 and the observer will return to the normally scheduled VE monitoring schedule. If the results of this test are greater than the >5% opacity, a positive Method 22 observation shall be recorded and the excess opacity must be recorded semi-annual report as an exceedance. Continue taking corrective action and conducting daily 30-minute Method 9 tests until the problem is corrected. When the Method 9 test verifies compliance with the applicable opacity limit, you may then return to the normal VE monitoring schedule.

5.0 Plan Implementation

5.1. Implementation

This plan, as required by the Title V permit that incorporates 40 CFR 63 Subpart LLL, will be used to insure compliance with the relevant terms and condition of the permit. The plan must be submitted to the Administrator for approval. Prior to submitting the plan to the Administrator, the plan may be revised without the Administrator's review. If revised after submittal to the Administrator, the revised edition must be submitted to the administrator for review and approval.

If any part of this plan is found to be ineffective, inadequate or unnecessary, the plan may be modified. After any revision that makes changes to procedures or is required by process changes or practices; a revised plan may be submitted to the administrator for approval. If the Administrator approves the revised plan or takes no action within 90 days, ACC may implement the revised plan. Revisions will be documented in Table 5-1.

Table 5-1
Sumterville Cement Plant
Operations and Maintenance Plan
Revision Log

Revision Date	Section (s) Revised	Revised by Name / Title	Submitted to Agency

Attachment 1

40 CFR 63 Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry *(excerpts),* § 63.1344, 63.1349 and 63.1350

Source: 64 FR 31925, June 14, 1999, unless otherwise noted

§ 63.1344 Operating limits for kilns and in-line kiln systems.

(a) The owner or operator of a kiln subject to a D/F emission limitation under § 63.1343 must operate the kiln such that the temperature of the gas at the inlet to the kiln particulate matter control device (PMCD) and alkali by-pass PMCD, if applicable, does not exceed the applicable temperature limit specified in paragraph (b) of this section. The owner or operator of an in-line kiln system subject to a D/F emission limitation under § 63.1343 must operate the in-line kiln system, such that:

(1) When the raw mill of the in-line kiln system is operating, the applicable temperature limit for the main in-line kiln system exhaust, specified in paragraph (b) of this section and established during the performance test when the raw mill was operating is not exceeded.

(2) When the raw mill of the in-line kiln system is not operating, the applicable temperature limit for the main in-line kiln system exhaust, specified in paragraph (b) of this section and established during the performance test when the raw mill was not operating, is not exceeded.

(b) The temperature limit for affected sources meeting the limits of paragraph (a) of this section or paragraphs (a)(1) through (a)(3) of this section is determined in accordance with § 63.1349(b)(3)(iv).

§ 63.1349 (b)(3)(iv) The run average temperature must be calculated for each run, and the average of the run average temperatures must be determined and included in the performance test report and will determine the applicable temperature limit in accordance with § 63.1344(b).

§ 63.1350 Monitoring Requirements.

(a) The owner or operator of each Portland cement plant shall prepare for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The plan shall be submitted to the Administrator for review and approval as part of the application for a part 70 permit and shall include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits of §§ 63.1343 through 63.1348;

(2) Corrective actions to be taken when required by paragraph (e) of this section;

(3) Procedures to be used during an inspection of the components of the combustion system of each kiln and each in-line kiln raw mill located at the facility at least once per year; and

(4) Procedures to be used to periodically monitor affected sources subject to opacity standards under §§ 63.1346 and 63.1348. Such procedures must include the provisions of paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

(i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A to part 60 of this chapter. The test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source,

the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of appendix A to part 60 of this chapter. The Method 9 test must begin within one hour of any observation of visible emissions.

(v) .....
(vi) .....
(vii) .....

(b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with paragraph (a) of this section shall be a violation of the standard.

(c) The owner or operator of a kiln or in-line kiln system shall monitor opacity at each point where emissions are vented from these affected sources including alkali bypasses in accordance with paragraphs (c)(1) through (c)(3) of this section.

(1) Except as provided in paragraph (c)(2) of this section, the owner or operator shall install, calibrate, maintain, and continuously operate a continuous opacity monitor (COM) located at the outlet of the PM control device to continuously monitor the opacity. The COM shall be installed, maintained, calibrated, and operated as required by subpart A, general provisions of this part, and according to PS–1 of appendix B to part 60 of this chapter.

(2) .....
(i) .....
(i) .....

(3) .....

(d) The owner or operator of a clinker cooler shall monitor opacity at each point where emissions are vented from the clinker cooler in accordance with paragraphs (d)(1) through (d)(3) of this section.

(1) Except as provided in paragraph (d)(2) of this section, the owner or operator shall install, calibrate, maintain, and continuously operate a COM located at the outlet of the clinker cooler PM control device to continuously monitor the opacity. The COM shall be installed, maintained, calibrated, and operated as required by subpart A, general provisions of this part, and according to PS–1 of appendix B to part 60 of this chapter.

(2) .....
(i) .....
(ii) .....

(3) .....

(e) The owner or operator of a raw mill or finish mill shall monitor opacity by conducting daily visual emissions observations of the mill sweep and air separator PMCDs of these affected sources, in accordance with the procedures of Method 22 of appendix A of part 60 of this chapter. The Method 22 test shall be conducted while the affected source is operating at the highest load or capacity level reasonably expected to occur within the day. The duration of the Method 22 test shall be six minutes. If visible emissions are observed during any Method 22 visible emissions test, the owner or operator must:

(1) Initiate, within one-hour, the corrective actions specified in the site specific operating and maintenance plan developed in accordance with paragraphs (a)(1) and (a)(2) of this section; and

(2) Within 24 hours of the end of the Method 22 test in which visible emissions were observed, conduct a visual opacity test of each stack from which visible emissions were observed in accordance with Method 9 of appendix A of part 60 of this chapter. The duration of the Method 9 test shall be thirty minutes.

(f) The owner or operator of an affected source subject to a limitation on D/F emissions shall monitor D/F emissions in accordance with paragraphs (f)(1) through (f)(6) of this section.

(1)

The owner or operator shall install, calibrate, maintain, and continuously operate a continuous monitor to record the temperature of the exhaust gases from the kiln, in-line kiln system and alkali bypass, if applicable, at the inlet to, or upstream of, the kiln, in-line kiln system and/or alkali by-pass PM control devices.

(i) The recorder response range must include zero and 1.5 times either of the average temperatures established according to the requirements in § 63.1349(b)(3)(iv).

(ii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

(2) The owner or operator shall monitor and continuously record the temperature of the exhaust gases from the kiln, in-line kiln system and alkali bypass, if applicable, at the inlet to the kiln, in-line kiln system and/or alkali bypass PMCD.

(3) The three-hour rolling average temperature shall be calculated as the average of 180 successive one-minute average temperatures.

(4) Periods of time when one-minute averages are not available shall be ignored when calculating three-hour rolling averages. When one-minute averages become available, the first one-minute average is added to the previous 179 values to calculate the three-hour rolling average.

(5) When the operating status of the raw mill of the in-line kiln system is changed from off to on, or from on to off the calculation of the three-hour rolling average temperature must begin anew, without considering previous recordings.

(6) The calibration of all thermocouples and other temperature sensors shall be verified at least once every three months.

Attachment 2

Air Pollution Control Equipment List

American Cement Company - Sumterville Cement Plant
Air Pollution Control Devices
Attachment 2

Emission Units	Process or Equipment	Process	ACC Emission Point ID No.	Original Equipment ID Designation	Control Device Equipment ID No.	Frequency of Visible Emissions Observation	Opacity Limit	Corrective Action Procedure
		Raw Mill	300	E19-01	4E1.PB01	COMS	<10%	NA
	Raw Mill	Raw Meal Airslide/Aeropol	305	F10-01	3J1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Homogenizing Silo - Top	310	G-10-01	3K1.BF02	Monthly 1 - minute	<5%	Flow Chart 1
		Kiln Feed Mixing Chamber	315	G-11-01	3K1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
EU 2	Blending Silo	Kiln Feed Airslide/Aeropole	320	H08-01	4C1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Kiln	325	E19-01	4E1.PB01	COMS	<10%	NA
EU 3	Kiln System	Top of Kiln Baghouse Dust Bin	330	E38-01	4E1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Clinker Cooler	335	E19-01	4E1.PB01	COMS	<10%	NA
		Cooler Discharge @ Conveyor	340	L03-01	4T1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Clinker Silo No. 1 - Top	345	L06-01	4T1.BF02	Monthly 1 - minute	<5%	Flow Chart 1
		Clinker Silo No. 2 - Top	350	L08-01	4T1.BF03	Monthly 1 - minute	<5%	Flow Chart 1
	Clinker Transport &	Clinker Silo Tunnel No. 1	355		5E1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
EU 4	Storage	Clinker Silo Tunnel No. 2	360		5E1.BF02	Monthly 1 - minute	<5%	Flow Chart 1
		Finish Mill	365	N12-01	5F1.PB01	Daily 6 - minute	<5%	Flow Chart 2
		Finish Mill Separator	370	N09-01	5F1.PB02	Daily 6 - minute	<5%	Flow Chart 2
EU 5	Finish Mill	Finish Mill Cement Handling	375	N81-01	5F1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
	Cement Handling,	Cement Silos (on silo No. 4)	380	Q25-01	5K1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
	Storage & Packing	Masonry Cement Silo No. 3	385	Q26-01	5K1.BF02	Monthly 1 - minute	<5%	Flow Chart 1
		Truck Loadout - (1) East	390	Q14-01	6D2.BF01	Monthly 1 - minute	<5%	Flow Chart 1
	Bulk Truck Loading	Truck Loadout - (2) West	395	Q17-01	6D2.BF02	Monthly 1 - minute	<5%	Flow Chart 1
EU 6	Packing	Packhouse	400	R12-01	6G.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Fine Coal/Pet. Coke Transport	405	S26-01	CV1.BF01	Monthly 1 - minute	<5%	Flow Chart 1
		Coal/Pet. Coke Grinding No. 1	410	S24-01	CR1.SF07	Monthly 1 - minute	<5%	Flow Chart 1
EU 7	Coal / Coke Grinding	Coal/Pet. Coke Grinding No. 2	415	S24-02	CR1.SF08	Monthly 1 - minute	<5%	Flow Chart 1

Attachment 3

Annual Combustion System Inspection

American Cement Company, LLC
Annual Combustion System Inspection - Kiln System
Attachment 3

				Year	2009
Equipment	**Date**	**Criteria**	**Parameters**	**Results**	
Kiln Coal Firing Systems (Indirect Fired)		Temperature monitoring	Coal Mill Inlet Temperature	Process – °F	
			Coal Mill Outlet Temperature	Process – °F	
		Performance	Coal mill motor current	AMPS	
			Coal mill motor power	KWH	
			Coal output Rate	TPH	
			Coal mill pressure drop	"H_2O	
		Coal firing	Main Burner	Coal Split: %	TPH
			CC Chamber Burner		
Kiln Inlet		Performance	Kiln Inlet % Oxygen	Process – %	
				Hand Held - %	
			Kiln Inlet ppm CO	Process – %	
				Hand Held - %	
Kiln/Main Burner		Performance - Burner "tip" parts will be checked for ware during each outage or as dictated by burner performance.	Swirl Air		
			Radial Air		
			Pressure		
		Measure air flow to the burner	Velocity	fpm or m/s	
Calciner Burner		Performance	Swirl Air		
			Radial Air		
			Pressure		
		Measure air flow to the burner	Velocity	fpm or m/s	
Calciner Exit		Performance	Calciner Exit % Oxygen	Process – %	
				Hand Held - %	
			Calciner Exit ppm CO	Process – ppm	
				Handheld – ppm	

Annual Combustion System Inspection - Kiln System
Attachment 3

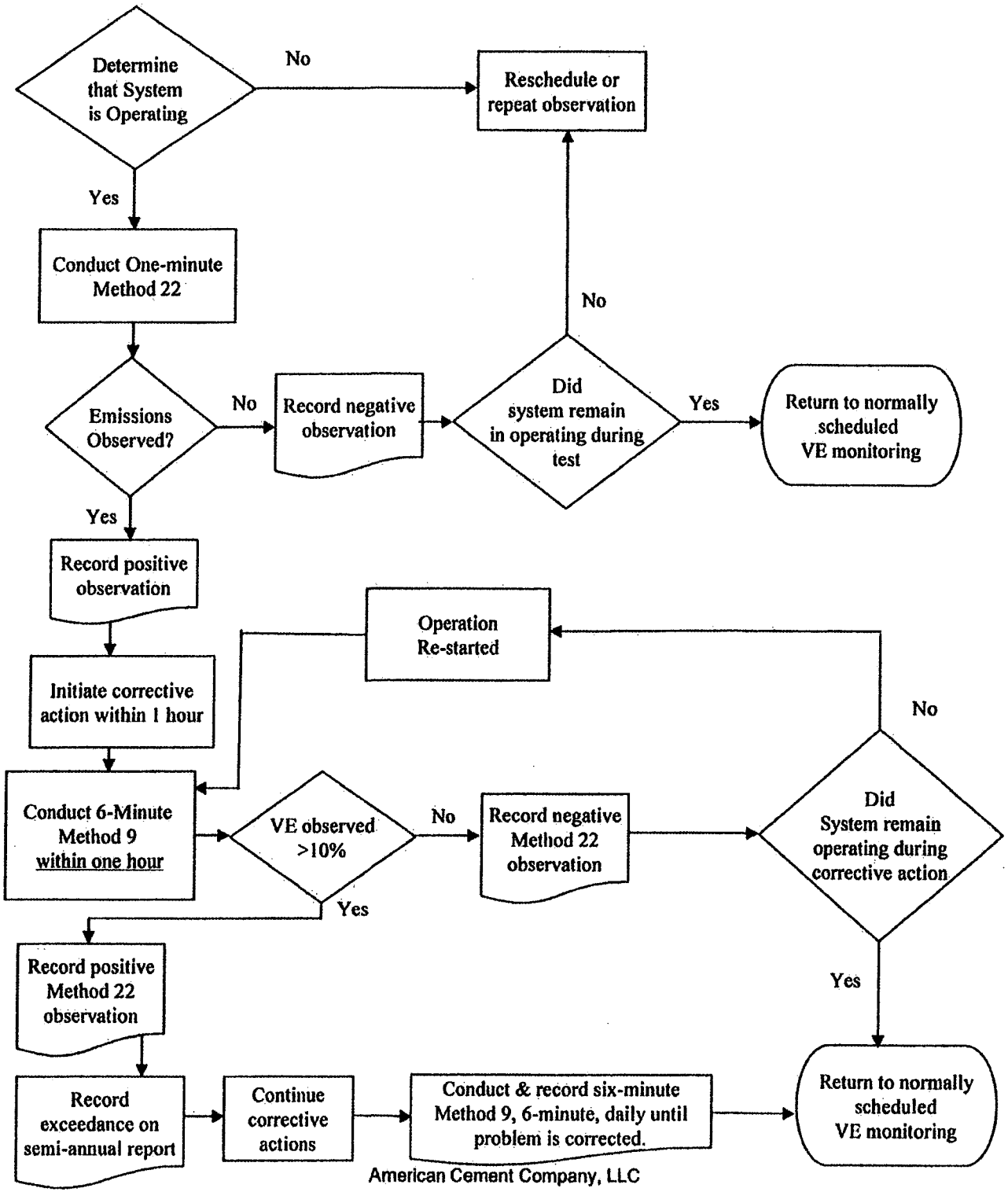
				Year	2009
Equipment	**Date**	**Criteria**	**Parameters**	**Results**	
Kiln ID Fan Inlet		Performance	Motor Current	AMPS	
			Power	KWH	
			Speed	RPM	
			Fan Pressure drop	"H_2O	
Preheater Tower		Inspect access hatches ports, flanges, and expansion joints for excess fresh air infiltration into the preheater tower and	All access openings should be capped/covered where practical and in good working order.		
Air Heater Burner		Measure the airflow to the burner.	Velocity	fpm or m/s	
Air Heater Fuel Firing System		Fuel firing	Diesel	GPM	
			Used Oil	GPM	
Air Heater Outlet		Measure the outlet gas temperature	Temperature °F	Handheld - °F	
				Process - °F	
Air Heater Fan		Performance	Motor Current	AMPS	
			Power	KWH	
			Speed	RPM	
			Fan Pressure drop	"H_2O	

Calciner exit and ID fan inlet are the same HB data (conditioning tower), no analyzer @ calciner & ID fan inlet

Attachment 4

Monthly Monitoring Procedure Flow Chart

Flow Chart No. 1
Monthly VE Emission Point
Monitoring Procedure
Attachment 4



American Cement Company, LLC

Attachment 5

Monthly Visible Emissions Inspection Report Form 1

American Cement Company - Sumterville Cement Plant
Production Monthly VE Inspection Report
Attachment 5

Title V Air Quality Permit No.: 1190042-001 AC		Date:		Name:					Signature:						
			Normal Operation		Military Time		Wind		1 - Minute Method 22 Observation			Sky Conditions			
Baghouse Location	ACC Emission Point ID No.	ΔP "H_2O	Yes	NO	Start	Stop	Speed	Dir.	POS	NEG	DN	CL	PC	OC	Work Order #, If Required
Raw Meal Airslide/Aeropol	3J1.BF01														
Homogenizing Silo - Top	3K1.BF02														
Kiln Feed Mixing Chamber	3K1.BF-01														
Kiln Feed Airslide/Aeropol	4C1.BF01														
North of Preheater Tower	4E1.PB01														
Top of Baghouse Dust Bin	4E1.BF01														
North of Preheater Tower	4E1.PB01														
Cooler Discharge @ Conveyor	4T1.BF01														
Clinker Silo No. 1 - Top	4T1.BF02														
Clinker Silo No. 2 - Top	4T1.BF03														
Clinker Silo Tunnel No. 1	5E1.BF01														
Clinker Silo Tunnel No. 2	5E1.BF02														
Finish Mill	5F1.PB01														
Finish Mill Separator	5F1.PB02														
Finish Mill Cement Handling	5F1.BF01														
Cement Silo No. 4	5K1.BF01														
Cement/Masonry Silo No. 3	5K1.BF02														
Truck Loadout - (1) East	6D2.BF01														
Truck Loadout - (2) West	6D2.BF02														
Cement Packing 6G.BF01	6G1.BF01														
Fine Coal/Pet. Coke Transport	CV1.BF01														
Coal/Pet. Coke Grinding No. 1	CR1.SF07														
Coal/Pet. Coke Grinding No. 2	CR1.SF08														

Operating Condition: If "No" is checked, explain in comments **Observations: POS - Positive** **NEG - Negative** **DN - Operation Down**

Comments:

Print Name _____ Signature _____ Date _____

1- Process Attendant must check the system for proper operation including low pressure, leaks, proper lubrication, and operation of timers and valves; check damper, bypass and isolation valves. If a problem is revealed, a work order is required to document repairs or a brief description in the comment section if work or task completed without work order.

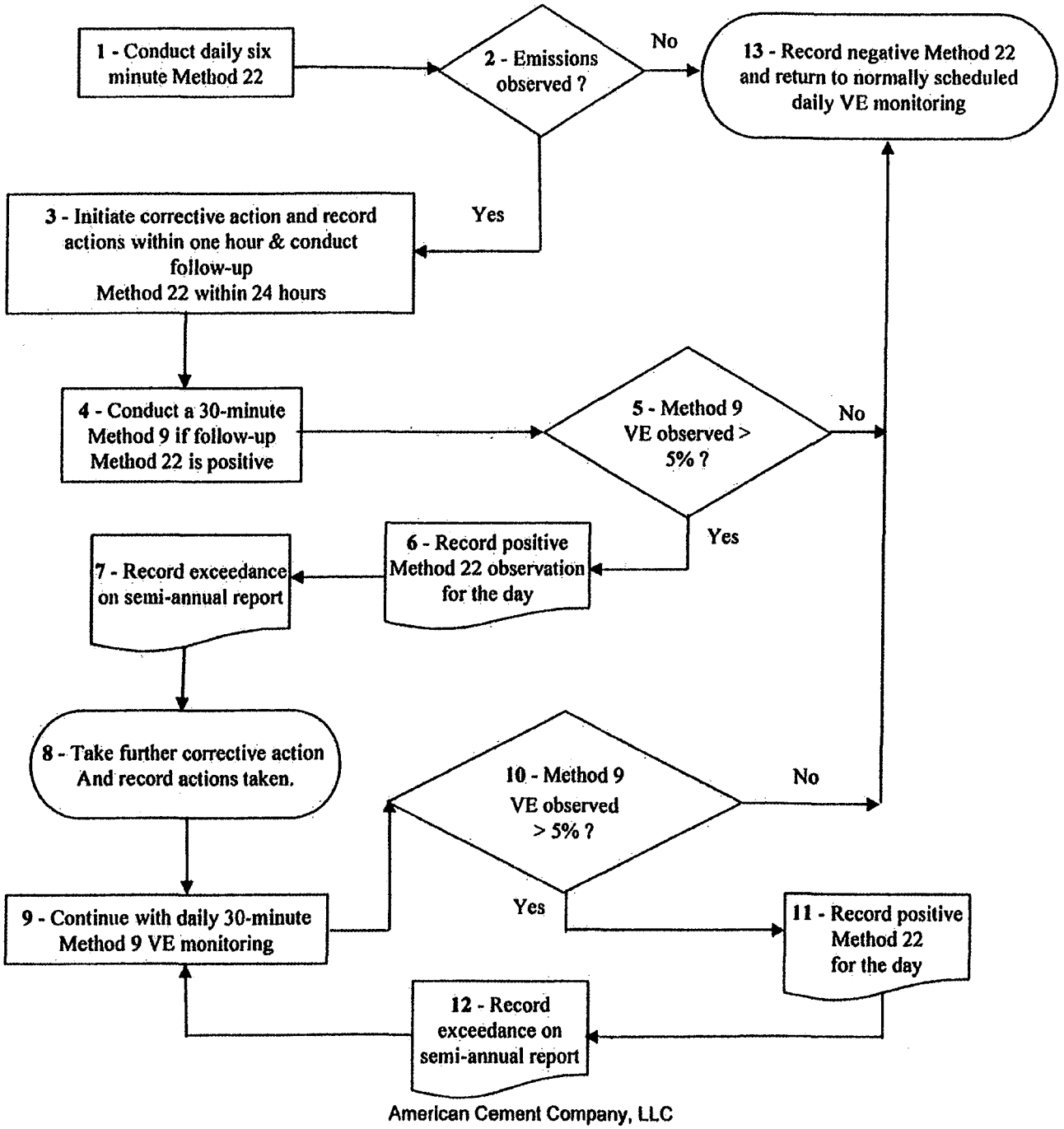
2 - Record the result of the Process Attendant's visible emissions observations, from shift reports. This designates whether visible emissions were observed during equipment checks; if so, a work order is required for any repairs not corrected immediately by the Process Attendant. ***Please document, in the comments section,*** any repairs made without a work order or work order number.

3 - Work orders are used to document corrective actions taken. Please be detailed in the work order and be specific in a description of the problem and document the date and time corrective action was completed

Attachment 6

Daily Monitoring Procedure Flow Chart 2

Flow Chart No. 2
Corrective Action Procedure
Finish Mills and Finish Mill Separator DC's
Attachment 6



American Cement Company, LLC

Attachment 7

Daily Visible Emission Inspection Report Form

American Cement Company - Sumterville Cement Plant
Daily Visible Emissions Inspection
Attachment 7

Title V Air Quality Permit No.: 1190042-001 AC **Permit Condition: E9**

Equipment	ID No.	Normal Operation Yes	Normal Operation No	Observer's Name (Print)	Date	Military Time Start	Military Time Stop	Time Min.	Observations POS	Observations NEG	Observations DN	Work Order #
Finish Mill Dust Collector	365							6				
Finish Mill Separator Dust Collector	370							6				

Comments:

_____

_____

_____

For "Operating Conditions" and "Observations" place a check or slash in the appropriate column

Operating Condition: If "No" is checked, explain in comments **Observations: POS - Positive** **NEG - Negative** **DN - Operation Down**

The source shall be observed for **six minutes *continuously*. An observation time period must be indicated for all operating equipment and *observe only one source at a time*.**

If dusting conditions (Positive) are noted, corrective action must be initiated within one-hour of the time that the dusting was noted. Record work order number and document corrective action taken in comment section

If dusting conditions are noted for two consecutive days, contact Production Coordinator to conduct a 30 minute Method 9 observation on the second day. A copy of the Method 9 form must be attached to the second day's report. If the results of the Method 9 test is less than 5%, resume normal VE schedule. If the result of the Method is greater than 5%, continue corrective actions.

Observer: _____
Print Name

_____
Signature

_____
Date

Attachment 8

Corrective Action Log

Corrective Action

Attachment 8

Date and Time CA Initiated	Equipment Number	Work Order Number *	Describe Corrective Action Taken

* - *If no work order required, please indicate*

Corrective action is required when VE is observed during a ***daily, weekly or monthly*** Method 22. You must initiate the corrective action , specified in the O & M plan, within **one hour.** Within 24 hours of the end of the Method 22 test which visible emissions were observed, conduct a follow-up Method 22. If no VE is observed, return to normal inspection schedule. If visible emissions are observed during the follow-up Method 22, conduct a **30-minute Method 9.** If the results of the method 9 is less than the opacity limit for the affected source for all 6 minute periods, return to normal monitoring schedule. Complete sections above to document the Corrective Action taken if the results of the method 9 is greater that the opacity limit (5% for dust collectors 10% all other affected sources) for any 6 minute period, continue corrective actions until the VE is below the opavity limit..

* A trained observer can conduct Method 22 Test. Smoke School Certified reader must conducts Method 9 Test. Attach completed visible emissions observation (VEO) form. Return report/forms to Envon. Mgr. ***All Entries Must be in Ink.***

Attachment 9

6-Minute Visible Emissions Observation Form

VISIBLE EMISSION OBSERVATION FORM - 6 MINUTE

Attachment 9

No. 1 of 1

COMPANY NAME: **American Cement Company, LLC**		
STREET ADDRESS: 4750 E CR 470		
CITY: Sumterville	STATE: FL	ZIP: 33585
PHONE (KEY CONTACT)	SOURCE ID NUMBER	
PROCESS EQUIPMENT	OPERATING MODE	
CONTROL EQUIPMENT	OPERATING MODE	

DESCRIBE EMISSION POINT		
HEIGHT ABOVE GROUND LEVEL	HEIGHT RELATIVE TO OBSERVER: Start / End	
DISTANCE FROM OBSERVER: Start / End	DIRECTION FROM OBSERVER: Start / End	

DESCRIBE EMISSIONS: Start / End		
EMISSION COLOR: Start / End	IF WATER DROPLET PLUME: Attached / Detached	
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: Start / End		

DESCRIBE PLUME BACKGROUND: Start / End		
BACKGROUND COLOR: Start / End	SKY CONDITIONS: Start / End	
WIND SPEED: Start / End	WIND DIRECTION: Start / End	
AMBIENT TEMP: Start / End	WET BULB TEMP / Rh. Percent	

OBSERVATION DATE	START TIME	END TIME

SEC / MIN	0	15	30	45	COMMENTS
1					
2					
3					
4					
5					
6					6 Min. Avg.

Stack with Plume

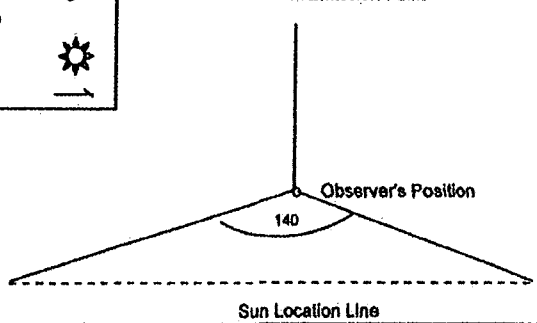
Sun

Wind

SOURCE LAYOUT SKETCH

X Emission Point

Draw North Arrow



OBSERVER'S NAME (PRINT)

OBSERVER'S SIGNATURE DATE

ORGANIZATION

American Cement Company, LLC

CERTIFIED BY DATE

ADDITIONAL INFORMATION:

CONTINUED ON VE FORM NUMBER

Attachment 10

30-Minute Visible Emissions Observation Form

VISIBLE EMISSION OBSERVATION FORM - 30 MINUTE
Attachment 10

No. 1 of 1

COMPANY NAME: **American Cement Company, LLC**

STREET ADDRESS: 4750 E CR 470

CITY: Sumterville | STATE: FL | ZIP: 33585

PHONE (KEY CONTACT) | SOURCE ID NUMBER

PROCESS EQUIPMENT | OPERATING MODE

CONTROL EQUIPMENT | OPERATING MODE

DESCRIBE EMISSION POINT

HEIGHT ABOVE GROUND LEVEL | HEIGHT RELATIVE TO OBSERVER — Start / End

DISTANCE FROM OBSERVER — Start / End | DIRECTION FROM OBSERVER — Start / End

DESCRIBE EMISSIONS — Start / End

EMISSION COLOR — Start / End | IF WATER DROPLET PLUME — Attached / Detached

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED — Start / End

DESCRIBE PLUME BACKGROUND — Start / End

BACKGROUND COLOR — Start / End | SKY CONDITIONS — Start / End

WIND SPEED — Start / End | WIND DIRECTION — Start / End

AMBIENT TEMP — Start / End | WET BULB TEMP | Rh. Percent

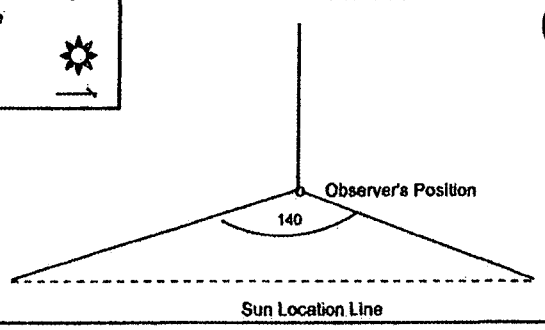
OBSERVATION DATE	START TIME	END TIME

SEC / MIN	0	15	30	45	COMMENTS
1					
2					
3					
4					
5					
6					6 Min. Avg.
7					
8					
9					
10					
11					
12					6 Min. Avg.
13					
14					
15					
16					
17					
18					6 Min. Avg.
19					
20					
21					
22					
23					
24					6 Min. Avg.
25					
26					
27					
28					
29					
30					6 Min. Avg.

Stack with Plume
Sun
Wind

SOURCE LAYOUT SKETCH — Draw North Arrow

X Emission Point



OBSERVER'S NAME (PRINT)

OBSERVER'S SIGNATURE — DATE

ORGANIZATION

American Cement Company, LLC

CERTIFIED BY — DATE

ADDITIONAL INFORMATION:

CONTINUED ON VE FORM NUMBER

Attachment

Compliance Assurance Monitoring

American Cement Company, LLC
CAM Applicability Analysis and CAM Plan

This document describes fabric filters at the referenced facility and CAM implications.
The pollutant is particulate matter (PM and PM_{10}).

Emission Units:

EU001 - Raw Material Quarrying, Crushing, and Storage
EU002 - Raw Materials, Conveying, Storage, and Processing
EU003 - Pyroprocessing System
EU004 - Clinker and Additives Storage and Handling
EU005 - Finish Mill
EU006 - Cement Handling, Storage, Packing, and Loadout
EU007 - Coal and Petroleum Coke Grinding System
EU008 - Fugitive Dust from Storage Piles, Paved and Unpaved Roads

Fabric Filters:

EU ID	ACC ID	Tag No.	Description
002	F10	3J1.BF01	Baghouse for raw meal transfer to air lift to homogenizing silo
002	G07	3K1.BF02	Baghouse for raw meal transfer to homogenizing silo
002	G10	3K1.BF01	Baghouse for homogenizing silo bin vent
002	E38	4E1.BF01	Baghouse for filter dust surge bin
002	H08	4C1.BF01	Baghouse for raw meal transfer for homogenizing silo
003	E19	4E1.PB01	Preheater/kiln/cooler/raw mill through Main Stack
004	L03	4T1.BF01	Baghouse from clinker transfer cooler discharge
004	L06	4T1.BF02	Baghouse from clinker transfer to clinker silo #1
004	M08	4T1.BF03	Baghouse from clinker transfer to clinker silo #2
004	DC-1	5E1.BF01	Dust collector from clinker transfer from clinker silos (west)
004	DC-2	5E1.BF02	Dust collector from clinker transfer from clinker silos (east)
005	N-93	5F1.PB02	Finish Mill Air Separator
005	N-94	5F1.PB01	Finish Mill Sweep
006	N-91	5F1.BF01	Cement transfer from finish mill
006	Q-25	5K1.BF01	Cement Silo #1, #2, #3, #5
006	Q-26	5K1.BF02	Cement Silo #4
006	Q-14	6D1.BF01	Truck Loadout #1 (West)
006	Q-17	6D2.BF01	Truck Loadout #2 (East)
006	R-12A	6G1.BF01	Packhouse Bagging
007	S-22	CR1.PB01	Coal/Petroleum Coke Mill Including Thermal Dryer (Two baghouses)
007	S-26	CV1.BF01	Coal/Petroleum Coke Bin

Units Not Subject to CAM Requirement

This section describes the activities where CAM is not applicable and provides justification.

EU ID	ACC ID	Tag No.	Description
004	DC-1	5E1.BF01	Dust collector from clinker transfer from clinker silos (west)
004	DC-2	5E1.BF02	Dust collector from clinker transfer from clinker silos (east)
005	N-93	5F1.PB02	Finish Mill Air Separator
007	S-22	CR1.PB01	Coal/Petroleum Coke Mill Including Thermal Dryer (Two baghouses)
007	S-26	CV1.BF01	Coal/Petroleum Coke Bin

Potential Pre-control Less than Major Source

For certain activities, the potential pre-control device emissions of the applicable regulated air pollutant are less than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (100 TPY); in accordance with 40 CFR 64.2(a)(3). This section provides brief justification.

The following activity exhibits pre-control device potential to emit under 100 TPY based on its permitted operating rate. The permit limit rate for this unit is 134,904 tons of product per year. Uncontrolled emission factors for this unit have been taken from webFIRE, and its predecessor AFSEF, for SCC 3-05-006-12: Cement Manufacturing – Raw Material Transfer.

EU ID	ACC ID	Tag No.	Description
007	S-26	CV1.BF01	Coal/Petroleum Coke Bin

PM :
$$\left(\frac{134{,}904\ tons\ product}{year}\right)\left(\frac{0.3\ lbs\ PM}{ton\ product}\right)\left(\frac{ton}{2{,}000\ lbs}\right) = 20.24\ \frac{tons\ PM}{year}$$

PM_{10} :
$$\left(\frac{134{,}904\ tons\ product}{year}\right)\left(\frac{0.15\ lbs\ PM_{10}}{ton\ product}\right)\left(\frac{ton}{2{,}000\ lbs}\right) = 10.12\ \frac{tons\ PM_{10}}{year}$$

Inherent Process Equipment

Certain activities are considered inherent process equipment, and are not subject to CAM. This inherent process equipment is material recovery equipment that the owner has installed and operated primarily for purposes other than compliance with air pollution regulations. The equipment is operated at an efficiency during normal process operations that is higher than is necessary in order to comply with the applicable emission limitation. For the purposes of this document, inherent process equipment is not considered a control device.

Both these activities are mills (finish mill and coal mill) that use fabric filters primarily for product capture after milling. The finish mill produces powdered cement, and the coal mill provides pulverized coal. All mill product is captured by the fabric filters.

EU ID	ACC ID	Tag No.	Description
005	N-93	5F1.PB02	Finish Mill Air Separator
007	S-22	CR1.PB01	Coal/Petroleum Coke Mill Including Thermal Dryer (two baghouses)

Compliance Assurance Monitoring Plan: Fabric Filters for PM Control

1. Background

a. Emissions Units

EU ID	ACC ID	Tag No.	Description
002	F10	3J1.BF01	Baghouse for raw meal transfer to air lift to homogenizing silo
002	G07	3K1.BF02	Baghouse for raw meal transfer to homogenizing silo
002	G10	3K1.BF01	Baghouse for homogenizing silo bin vent
002	E38	4E1.BF01	Baghouse for filter dust surge bin
002	H08	4C1.BF01	Baghouse for raw meal transfer for homogenizing silo
003	E19	4E1.PB01	Preheater/kiln/cooler/raw mill through Main Stack
004	L03	4T1.BF01	Baghouse from clinker transfer cooler discharge
004	L06	4T1.BF02	Baghouse from clinker transfer to clinker silo #1
004	M08	4T1.BF03	Baghouse from clinker transfer to clinker silo #2
004	DC-1	5E1.BF01	Baghouse from clinker transfer from clinker silos (west)
004	DC-2	5E1.BF02	Baghouse from clinker transfer from clinker silos (east)
005	N-94	5F1.PB01	Finish Mill Sweep
006	N-91	5F1.BF01	Cement transfer from finish mill
006	Q-25	5K1.BF01	Cement Silo #1, #2, #3, #5
006	Q-26	5K1.BF02	Cement Silo #4
006	Q-14	6D1.BF01	Truck Loadout #1 (West)
006	Q-17	6D2.BF01	Truck Loadout #2 (East)
006	R-12A	6G1.BF01	Packhouse Bagging

b. Applicable Regulation, Emission Limit, and Monitoring Requirements

For emission unit 003
Regulation No.: 62-212-400 F.A.C. (BACT) and 62-4-070(3) F.A.C.
Particulate Matter (PM): 0.153 lb/ton of clinker, 3-hr average
Visible Emissions: 10%
Monitoring requirements: Visible emissions tests; annual monitoring (methods 5 and 9); COMS

For ALL emission units, EXCEPT emission unit 003
Regulation No.: 62-212-400 F.A.C. (BACT) and 62-4-070(3) F.A.C.
Particulate Matter (PM): 0.01 gr/dscf
Particulate Matter (PM_{10}): 0.007 gr/dscf
Visible Emissions: 5% opacity
Monitoring Requirements: Visible emissions tests; method 9 annually

c. Control Technology

Pulse-jet baghouse operated under negative pressure.

2. Monitoring Approach

a. Indicator

Baghouse pressure drop will be used as an indicator. For EU003, COMS will be used as a secondary indicator.

b. Measurement Approach

Pressure drop across the baghouse will be monitored daily. For EU003, the COMS gives continuous readings of duct opacity.

c. Indicator Range

The indicator range is between 2" and 8" w.g. For EU003, the COMS indicator range is 0% to 10% opacity.

d. QIP Threshold

The QIP threshold is nine (9) excursions in a six month reporting period.

e. Performance Criteria

Data Representativeness: Measurements are made at the control devices.

Verification of Operational Status: Daily recording will not operational status.

QA/QC Practices and Criteria: The recorded data will be reviewed by the Environmental Manager

Monitoring Frequency and Data Collection Procedure: Each baghouse pressure drop will be recorded daily from the Magnahelic or Photohelic gauge. For EU003, COMS is audited annually.

3. Justification

a. Background

This facility manufactures Portland cement. The pollutant-specific emissions units are material handling processes controlled by fabric filters (baghouses).

b. Rational for Selection of Performance Indicator

Pressure drop was selected as the performance indicator because it is indicative of operation of the baghouse in a manner necessary to comply with the particulate matter and visible emissions standards. When the baghouse is operating properly, there will not be any visible emissions from the exhaust.

Any increase or decrease in pressure drop, approaching the limits of the stated range, indicates reduced performance of a particulate control device, therefor the observed pressure drop is used as a performance indicator. For EU003, an increase in monitored opacity indicates reduced performance of the particulate control device, therefor opacity monitored by the COMS is used as a secondary performance indicator.

c. Rationale for Selection of Indicator Level

Operation of the baghouses with pressure drops within the selected indicator range will generally result in no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported.

An indicator range using pressure drop was selected because:

(1) an increase or decrease in pressure drop outside the selected range can result in visible emissions, indicative of an increase in particulate emissions; and

(2) a monitoring technique which does not require a Method 9 certified observer is desired.

For EU003, the COMS is a secondary indicator. Based on available data under normal operation, opacity varies with load and operating conditions. Variability is typically a gradual increase or decrease, with occasional sudden spikes and dips. A sudden and sustained step-increase in opacity could indicate a failure in one or more of the baghouse compartments.

The selected QIP threshold for baghouse visible emissions is nine (9) excursions in a 6-month reporting period. This level is 5 percent of the total pressure drop observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.

Table 1. Monitoring Approach

	Indicator 1. All EU subject to CAM	Indicator 2. For EU003 only
I. Indicator	Baghouse pressure drop	Change in duct opacity
Measurement Approach	Gauge monitored daily	Continuous opacity monitoring system (COMS).
II. Indicator Range	2" – 8" w.g. An excursion is defined as a pressure drop outside the stated range.	An excursion is defined as any sudden and sustained step-change (increase) in opacity as documented by the trend of the consecutive 6-minute averages (other than startup and shutdown periods).
III. Performance Criteria		
Data Representativeness	Pressure drop was selected as the performance indicator because it is indicative of operation of the baghouse in a manner necessary to comply with the particulate matter and visible emissions standards. When the baghouse is operating properly, there will not be any visible emissions from the exhaust.	Based on available data under normal operation, opacity varies with load and operating conditions. Variability is typically a gradual increase or decrease, with occasional sudden spikes and dips. A sudden and sustained step-increase in opacity could indicate a failure in one or more of the baghouse compartments.
Verification of Operational Status	Daily recording will note operational status of gauge and control device.	The COM system is audited annually.
QA/QC Practices and Criteria	The recorded data will be reviewed by the Environmental Manager.	Install and operate COMS according to 40 CFR Part 60 Appendix B, Performance Specification 1 and general provisions 60.13.
Monitoring Frequency	Each baghouse pressure drop will be recorded daily from the magnahelic or photohelic gauge.	Continuous.
Data Collection Procedures	Personnel designated by the operator will observe and record the baghouse pressure drop.	The COMS collects data that are reduced to 6-minute averages. Consecutive 6-minute averages are tracked through the Distributed Control System (DCS) and CEM software.
Averaging Period	None.	None.

Attachment

Process Flow Diagram – EU001

BY OTHERS

C02-01

C02-10

G	1200
H	15-17
SG	90

C04-01

FROM TRUCK

C05-01

LIMESTONE 10,000 STONS

LIMESTONE 10,000 STONS

OVERBURDEN 6,000 STONS

ASH 3,000 ST

MILL SCALE/ IRON ORE 1,000 ST

CAPACITY 20 ST MILL SCALE/ IRON ORE

D04-01

D05-01

G	255
H	15-17

40 ST D06-01

D07-01

G	5-50
H	8-10

40 ST D08-01

D09-01

G	5-50
H	18-20

G	0.8-8
H	5

	OPERATING	DESIGN
G	280	375
H	15-17	

D01-01

D02-01

	OPERATING	DESIGN
G	100	133

	OPERATING	DESIGN	
G	280	375	(@ 17% H2O)
H	15-17		

TO GRINDING SYSTEM SHEET 002

D13-01

D04-01

D03-01

PLANT ELEVATION: 80 FT.

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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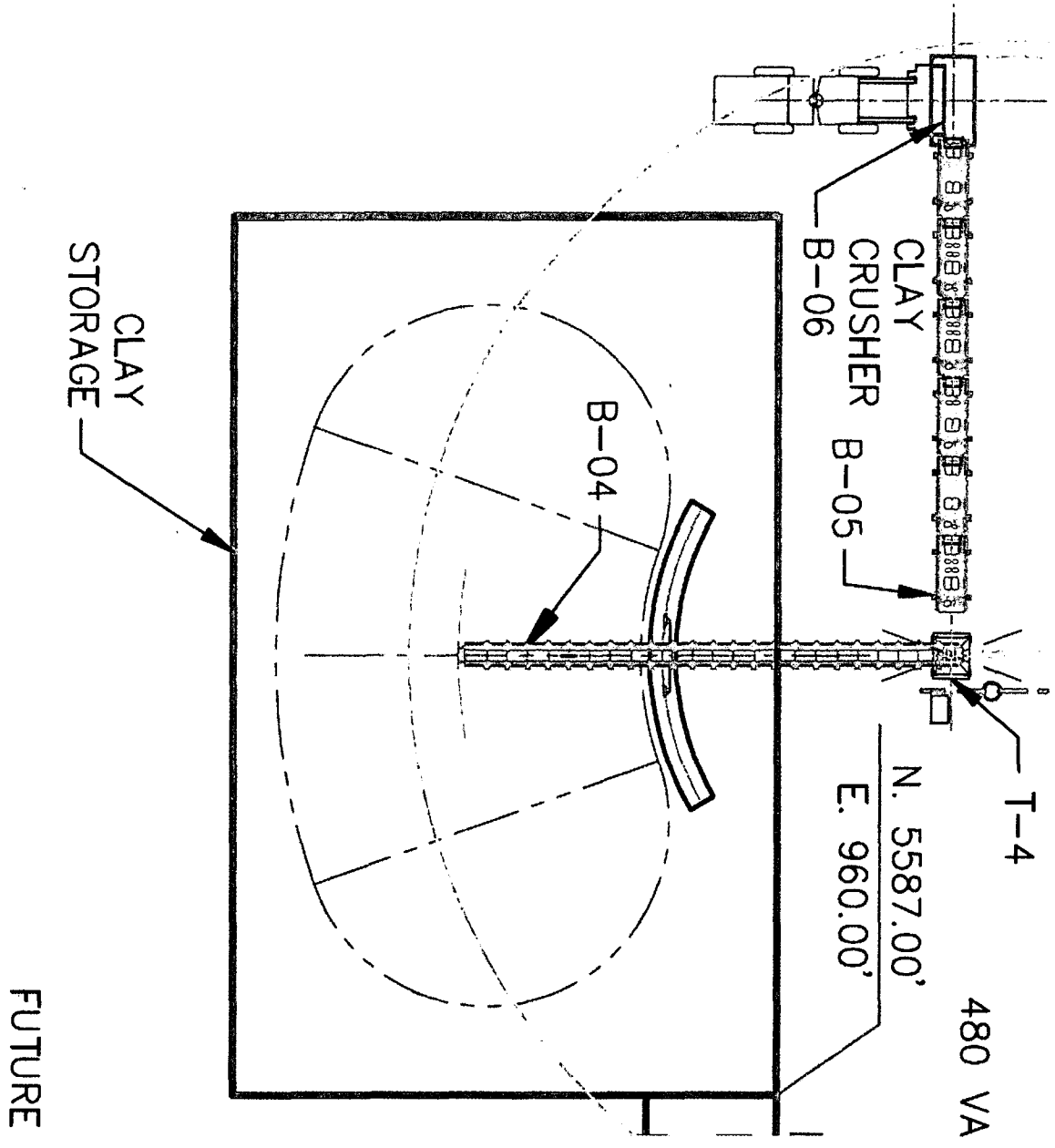
BACK-UP QUARRY SYSTEM



B-06: Crusher rated 400 to 500 TPH (Gundlach S&A 60)
B-05: Belt 48" x 140' rated 400 to 500 TPH
B-04: Radial Stacker 36" x 120' rated 400 to 500 TPH

Attachment

Process Flow Diagram – EU002

FROM SCREW PUMP E24-01 SHEET 002

F06-02

G07-08 VB 22,000

ACC: G-11
TV: G-07

G07-01

G07-05

F07-01

F07-02

F06-01

F08-01

F08-02

TANGENTIAL HOMOGENIZING SILO 10,000 ST RAW MEAL G01-01

BIN MOUNTED

VB 5000

G10-08
G10-01

C

G 230

G04-01

G05-01

120 ST G06-01

G-09-01

G07-01

G08-01

H01-02

H01-01

E-38-01

E-38-08

VB 6,000

E38-05

FILTER DUST SURGE BIN E36-01 60 ST

E35-01

E34-01

E31-01

E32-01

E33-01

E28-01

E30-01

E29-01

TO KILN SYSTEM SHEET 004

H09-02

H09-04

G 206

H09-01

K17-01

FROM COOLING TOWER K10-01 SHEET 004

H08-08

VB 1,000

H08-01

H08-05

Y02-01

SAMPLE

H05-01

H07-01

H06-11

H06-01

F10-08

F10-01

VB 1,000

F10-05

FROM RAW GRINDING SYSTEM SHEET 002

F02-01

G 182-192

Y01-01

SAMPLE

F04-01

F05-01

F05-11

G 0 - 25

PLANT ELEVATION: 80 FT.

LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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Attachment

Process Flow Diagram – EU003

E-89

E15-01

E18-01

E96-02

WINTER		SUMMER
T	308	315

COMPOUND	WINTER	SUMMER	DIRECT
P	-15	-15	-15
T	308	315	439
VN	318,523	312,071	241,280

D	10.2
HEIGHT	350

E21-01

E20-01

M	4,000

OPERATING	
P	-36
T	199
VB	300,000
VN	240,068

E19-01

E19-01

PULSE JET FILTER

E19-01
MAIN BAGHOUSE

D36-01

D03-01

FROM RAW MATERIAL STORAGE SHEET 001

D45-01

G	320

@ 75 % BUCKET FULL

E16-01

E16-01

E17-01

E17-01

BYPASS

RECYCLE

E22-01

E23-01

E23-01

E22-01

OPERATING	DESIGN
G 23	30 @30%
H <0.5	<0.5

MASS FLOW BIN 20 ST

D-46

D-47

TO TRUCK

E25-01

F01-01

E24-01

TO SURGE BIN E36-01 SHEET 003

E26-01

OPERATING	DESIGN
G 230	320
H <1	<1
KR 15	17

F03-01

F03-08

VB	1,000

F03-05

F02-01

TO HOMOGENIZING SILO SHEET 003

D48-01 90 STON

D4-019

E88-01

6 T

M	250

WINTER		SUMMER
T	680	680
VN	72,003	78,455

E96-06

WINTER		SUMMER
T	680	680
VN	28,997	22,545

COMPOUND	
T	716
VN	119,700

E01-01

E12-01

E11-01

SEPOL RMR-3500

QUADROPOL RMR 36/18

WINTER		SUMMER
T	611	600
VN	179,014	179,014

E96-01

E96-03

FROM DOPOL PREHEATER SHEET 004

FROM CLINKER COOLER SHEET 004

WINTER		SUMMER
T	95	41
VN	36,789	30,317

E96-04

E02-01

NATURAL GAS OR NO. 2 FUEL OIL BY CUSTOMER

COMPOUND	
T	680
VN	101,000

EXTRACTION DECVICE

E96-05

TO KILN

M	50

E10-01

M	2,600
N	900

E-07 ROLL EXTRACTOR HYDRAULIC SYSTEM (MOBILE UNIT)

PLANT ELEVATION: 80 FT.

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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Attachment

Fuel Specification – EU003

environmental
Hydrocarbon Recovery Services, Inc.

105 S. Alexander Street
Plant City, FL 33563
(813) 754-1504 x3133

CERTIFIED ANALYSIS

Project ID:	Finished Product	Company Name:	Hydrocarbon Recovery Services - Plant City
Site address:	Plant City, FL	Client address:	105 S. Alexander St.
Sample Date:	1/11/2010	City, State, zip:	Plant City, FL 33563
Sample Time:	9:34:00 AM		
FCC Lab ID#:	10-0014	Client Phone:	813-754-1504
Tank:	552	Sampled By:	Jesus Valencia
Matrix:	Oil	Report Date:	1/12/2010
Sample Location:	3-Foot Line		

Parameter	Method	Result/Initials	Analysis date	Prep date	Units	MDL	PQL	Dilution Factor	Regulatory Limit*
Viscosity	Visgage	165 AS	1/11/2010	1/11/2010	SSU@100°F	10	NA	1	N/A
Flash Point	EPA1010A	230 AS	1/11/2010	1/11/2010	°F	30	NA	1	>100°F
API Gravity	D287	30.0 AS	1/11/2010	1/11/2010	N/A	0	NA	1	N/A
Percent Water	D95	0.2 AS	1/11/2010	1/11/2010	%	0.1	NA	2	N/A
Percent Ash	D482	.8281 AS	1/12/2010	1/12/2010	%	0.01	NA	1	N/A
Total Halogens (TX)	EPA 9075	159 AS	1/11/2010	1/11/2010	mg/Kg	20	50	1	1000
Percent Sulfur	D4294-03	0.3289 AS	1/11/2010	1/11/2010	%	0.05	0.05	1	N/A
PCBs Aroclor 1016	EPA8082	ND AS	1/11/2010	1/11/2010	mg/Kg	0.23	2.0	4	2
PCBs Aroclor 1242	EPA8082	ND AS	1/11/2010	1/11/2010	mg/Kg	1.6	2.0	4	2
Aroclor 1254	EPA8082	ND AS	1/11/2010	1/11/2010	mg/Kg	1.6	2.0	4	2
PCBs Aroclor 1260	EPA8082	ND AS	1/11/2010	1/11/2010	mg/Kg	1.1	2.0	4	2
Pounds per Gallon	CALC	7.296 CB	1/12/2010	1/12/2010	Lbs/gal	N/A	NA	N/A	N/A
BTU per Gallon	CALC	142,856 CB	1/12/2010	1/12/2010	BTU/gal	N/A	NA	N/A	N/A
Arsenic	3040A/6010B	BRL AS	1/12/2010	1/12/2010	mg/Kg	0.2	2.0	10	5
Cadmium	3040A/6010B	BRL AS	1/12/2010	1/12/2010	mg/Kg	0.02	0.10	10	2
Chromium	3040A/6010B	.82 AS	1/12/2010	1/12/2010	mg/Kg	0.07	0.10	10	10
Lead	3040A/6010B	10.9 AS	1/12/2010	1/12/2010	mg/Kg	0.2	0.10	10	100

BTEX levels = Below Contracted Maximum
= Value is between the MDL and the PQL
PQL = Practical Quantitation Limit
ND= analyte was analyzed for but not detected above the reporting limit
I = Under the Minimum Detection Limit

Ana Saldana

Chemist / Lab Technician

Ana Saldana / Lab Technician

Chemist/Lab Technician

Kelli Winter
Carol Barrick / Laboratory Manager

State of Florida Certification: E84160

The regulatory limit stated above reflects the Federal EPA limit for on-specification fuel oil as defined in 40 CFR 279.11. The on-specification limit for PCB's is posed by 40 CFR 761.20 (e). These regulatory limits may be less stringent than those required by site-specific permit requirements that may be held by the consumer. Please reference any applicable permits prior to acceptance of this material to ensure compliance.

The lab certifies results meet all requirements of the NELAC standards, unless otherwise noted. All weights are based on wet weights unless otherwise specified. If you have any questions, please contact Carol Barrick at (813) 754-1504 x3132.

Attachment

Identification of Applicable Requirements – EU003

Applicable Requirements –
Emissions Unit 003: Pyroprocessing System

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- 62-212.400(10)(b)
- 62-296.407(2)(a)
- 62-296.407(2)(b)
- 62-296.407(3)
- 62-297.310(1)
- 62-297.310(2)
- 62-297.310(3)
- 62-297.310(4)
- 62-297.310(5)
- 62-297.310(6)
- 62-297.310(7)
- 62-297.310(8)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (b) (1)
- 40 CFR 63.1340 (b) (2)
- 40 CFR 63.1340 (b) (3)

40 CFR 63.1343 Standards for kilns and in-line kiln/raw mills.
[71 FR 76549, Dec. 20, 2006]

- 40 CFR 63.1343 (a)
- 40 CFR 63.1343(c)

40 CFR 63.1344 Operating limits for kilns and in-line kiln/raw mills.
[64 FR 31925, June 14, 1999, as amended at 67 FR 72585, Dec. 6, 2002; 71 FR 76550, Dec. 20, 2006]

- 40 CFR 63.1344 (a) (1)
- 40 CFR 63.1344 (a) (2)
- 40 CFR 63.1344 (b)
- 40 CFR 63.1344 (g)
- 40 CFR 63.1344 (h)
- 40 CFR 63.1344 (i)

40 CFR 63.1345 Standards for clinker coolers.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1345

40 CFR 63.1347 Standards for raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1347

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1349 (b) (1) (i)
- 40 CFR 63.1349 (b) (1) (ii)
- 40 CFR 63.1349 (b) (1) (iii)
- 40 CFR 63.1349 (b) (1) (v)
- 40 CFR 63.1349 (b) (3)
- 40 CFR 63.1349 (b) (3) (i)
- 40 CFR 63.1349 (b) (3) (ii)
- 40 CFR 63.1349 (b) (3) (iii)
- 40 CFR 63.1349 (b) (3) (iv)
- 40 CFR 63.1349 (b) (4) (i)
- 40 CFR 63.1349 (c)
- 40 CFR 63.1349 (d)
- 40 CFR 63.1349 (e)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

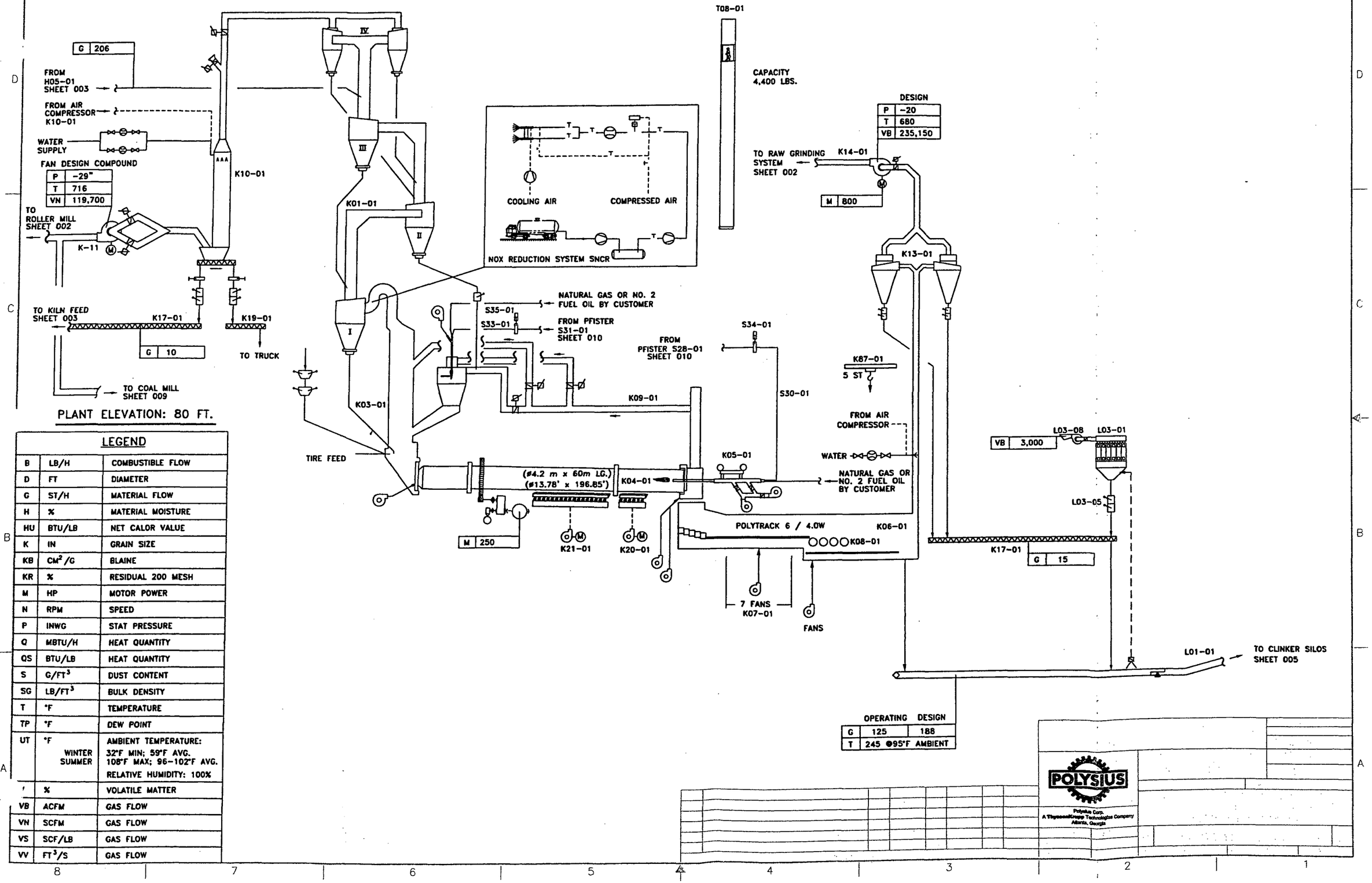
- 40 CFR 63.1350 (a) (3)
- 40 CFR 63.1350 (c) (1)
- 40 CFR 63.1350 (c) (3)
- 40 CFR 63.1350 (d) (1)
- 40 CFR 63.1350 (d) (3)
- 40 CFR 63.1350 (e)
- 40 CFR 63.1350 (f)
- 40 CFR 63.1350 (i)
- 40 CFR 63.1350 (h) (1)
- 40 CFR 63.1350 (h) (4)
- 40 CFR 63.1350 (k)
- 40 CFR 63.1350 (o)
- 40 CFR 63.1350 (p)

40 CFR 63.1357 Temporary, conditioned exemption from particulate matter and opacity standards.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16622, Apr. 5, 2002]

- 40 CFR 63.1357

Attachment

Process Flow Diagram – EU004



LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER / SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. / 108°F MAX; 96–102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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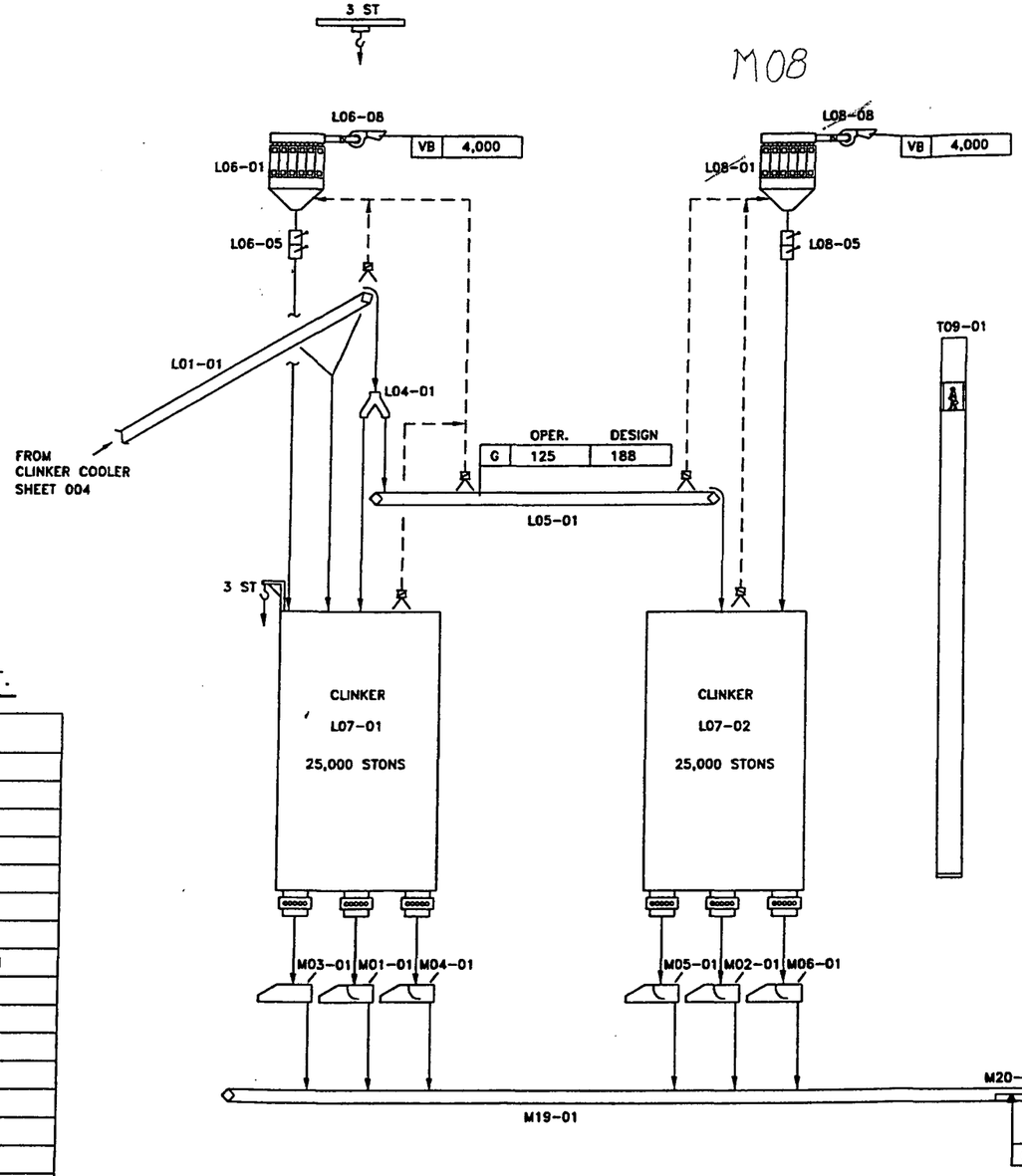
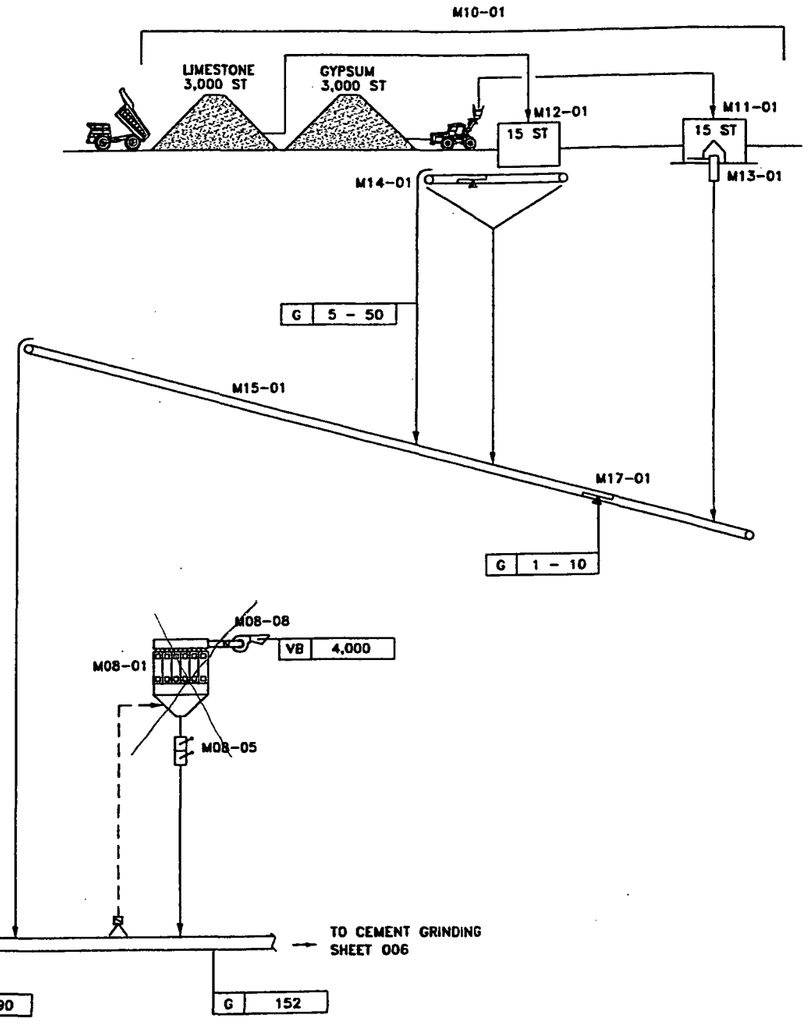
M08





PLANT ELEVATION: 80 FT.

LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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Attachment

Identification of Applicable Requirements – EU004

Applicable Requirements –
Emissions Unit 004: Clinker and Additives Storage and Handling

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- 62-212.400(10)(b)
- 62-296.407(3)
- 62-297.310(1)
- 62-297.310(2)
- 62-297.310(3)
- 62-297.310(4)
- 62-297.310(5)
- 62-297.310(6)
- 62-297.310(7)
- 62-297.310(8)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (b) (6)
- 40 CFR 63.1340 (b) (7)

40 CFR 63.1348 Standards for affected sources other than kilns; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1348

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1349 (b) (2)
- 40 CFR 63.1349 (c)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1350 (a) (4)
- 40 CFR 63.1350 (j)

Attachment

Process Flow Diagram – EU005

N 93

N 94

PLANT ELEVATION: 80 FT.

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

	WINTER	SUMMER
T	140	177
VN	132,771	125,591

D 6.0

5 ST

N93-01

N10-05

N10-01

N09-01

P -21
T 200
VB 150,000

M 600

N09-06

N20-01

N09-01

N09-07

N09-06

N20-11

N18-02

7.5 ST

N88-01

N06-01

M 400

NSV290/0

N06-02

	WINTER	SUMMER
G	348	348
T	130	170

N05-01

N05-06

N05-02

N05-07

CHUTE WITH SLOPING SCREEN

7.5 ST

N89-01

N05-04

N91-08

N91-01

VB 8,000

N91-05

N07-01

N07-02

N18-01

OPERATING

G 500

FROM SCREW PUMP P01-01 SHEET 008

N08-01

	WINTER	SUMMER
G	152	152
T	122	248
95%CI/5%GYP	95%CI/5%GYP	

G 0-500

20 ST

N87-01

FROM CLINKER SILOS SHEET 005

M19-01

M19-05

D 4

N94-01

	WINTER	SUMMER
T	215	229
TP	-	131
VN	22,194	22,194

N13-05

N13-01

N12-01

N01-01

5.2m DIA X 15.5m

I

II

N01-90

SPRAYLANCE

N15-02

N16-02

M 125

P -15
T 230
VB 30,000

N12-06

N22-01

N12-07

SUMMER

H_2O 10 GPM

N04-01

N03-01

SUMMER

H_2O 5 GPM

M 8,750

N01-80

M 100

N15-01

WATER SPRAY TANK

GRINDING AID SYSTEM SHEET 007

BY CONTRACTOR

BY OWNER

T 90

WATER SUPPLY

Y03-01

	WINTER	SUMMER
G	152	152
T	130	170
KB	3,800	3,800

SAMPLE

FUTURE

N19-01

TO SHEET 008 CEMENT SILOS

M 100

POLYSIUS

Polysius Corp.
A ThyssenKrupp Technologies Company
Atlanta, Georgia

Attachment

Identification of Applicable Requirements – EU005

Applicable Requirements –
Emissions Unit 005: Finish Mill

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- 62-212.400(10)(b)
- 62-297.310(1)
- 62-297.310(2)
- 62-297.310(3)
- 62-297.310(4)
- 62-297.310(5)
- 62-297.310(6)
- 62-297.310(7)
- 62-297.310(8)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (b) (4)
- 40 CFR 63.1340 (b) (6)
- 40 CFR 63.1340 (b) (7)

40 CFR 63.1347 Standards for raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1347

40 CFR 63.1348 Standards for affected sources other than kilns; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1348

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

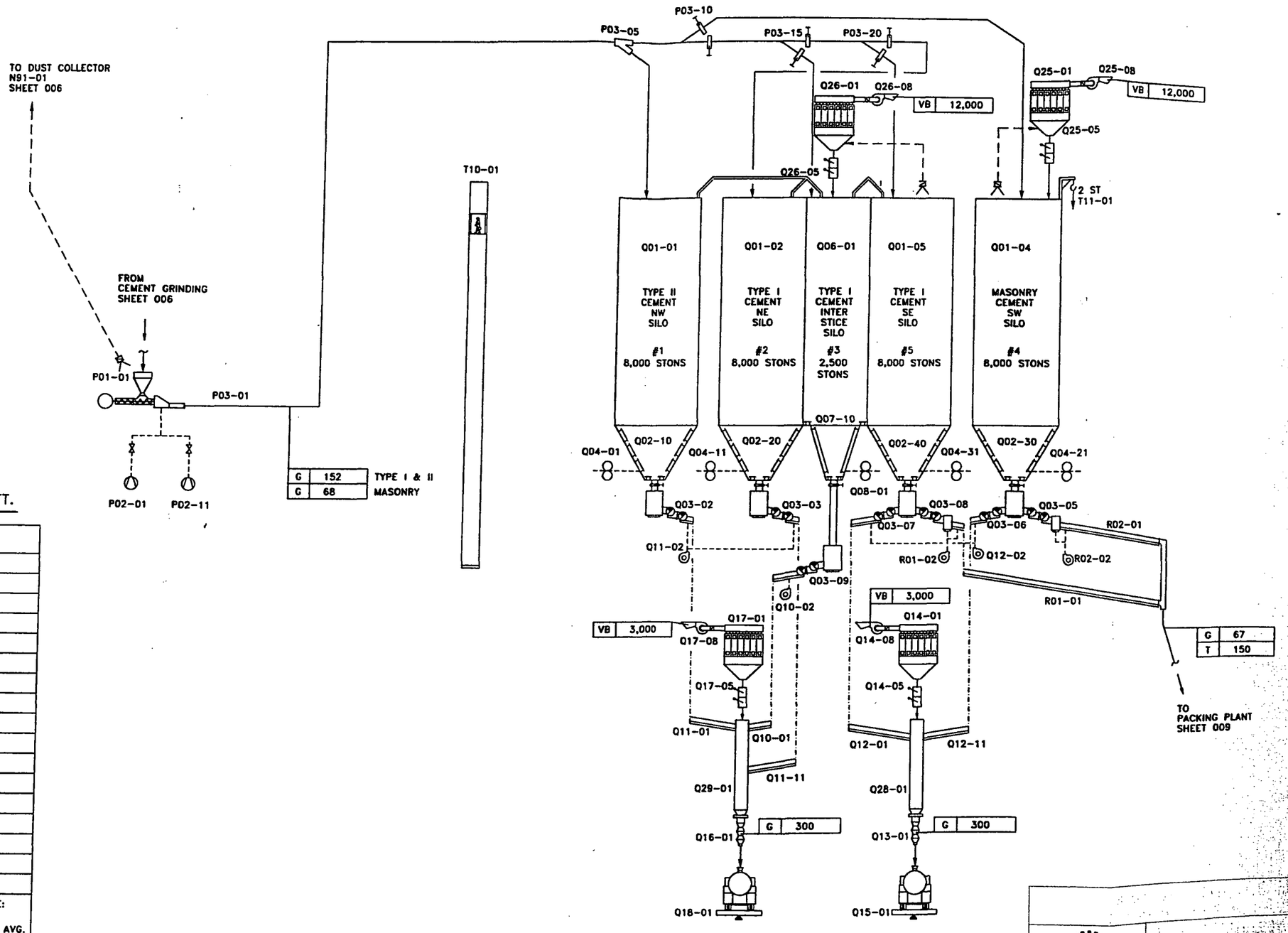
- 40 CFR 63.1349 (b) (2)
- 40 CFR 63.1349 (c)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1350 (a) (4)
- 40 CFR 63.1350 (e)
- 40 CFR 63.1350 (j)

Attachment

Process Flow Diagram – EU006



PLANT ELEVATION: 80 FT.

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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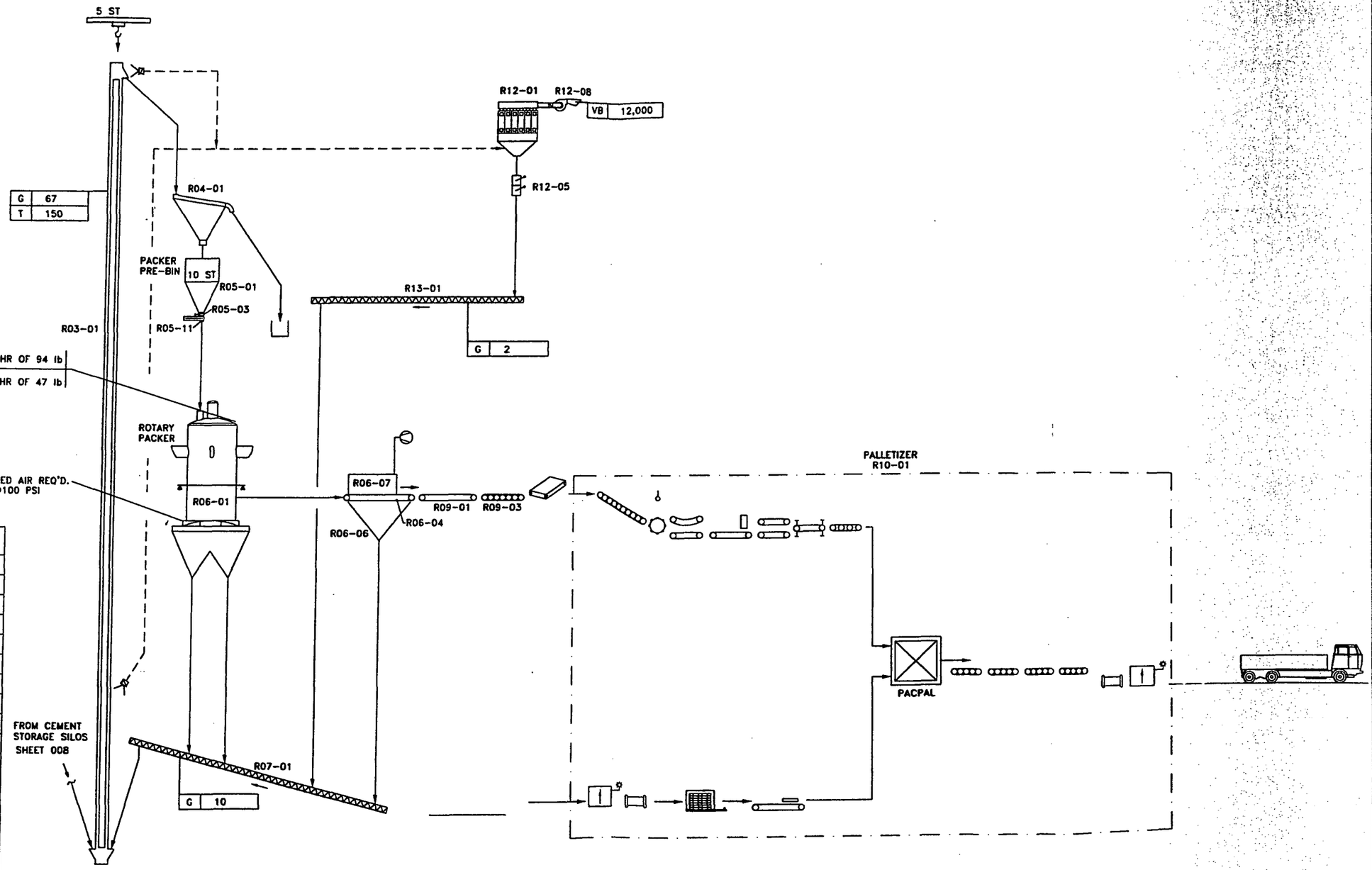
Atlanta, Georgia



PLANT ELEVATION: 80 FT.

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200 MESH
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

POLYSIUS

Polysius Corp.
A ThyssenKrupp Technologies Company
Atlanta, Georgia

Attachment

Identification of Applicable Requirements – EU006

Applicable Requirements –
Emissions Unit 006 : Cement Handling, Storage, Packing, and Loadout

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- 62-212.400(10)(b)
- Chapter 62-297.310(1)
- Chapter 62-297.310(2)
- Chapter 62-297.310(3)
- Chapter 62-297.310(4)
- Chapter 62-297.310(5)
- Chapter 62-297.310(6)
- Chapter 62-297.310(7)(a)4.a.
- Chapter 62-297.310(8)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (b) (6)
- 40 CFR 63.1340 (b) (7)
- 40 CFR 63.1340 (b) (8)

40 CFR 63.1348 Standards for affected sources other than kilns; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1348

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

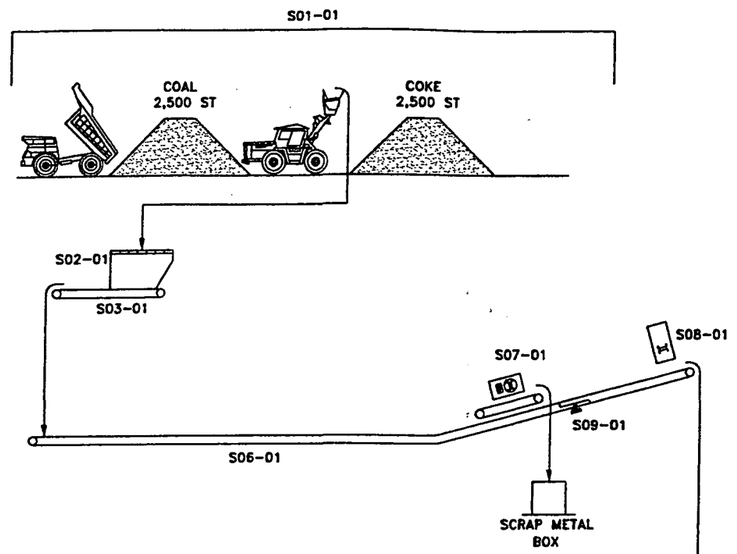
- 40 CFR 63.1349 (b) (2)
- 40 CFR 63.1349 (c)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1350 (a) (4)
- 40 CFR 63.1350 (j)

Attachment

Process Flow Diagram – EU007



PLANT ELEVATION: 80 FT.

LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200m
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F WINTER SUMMER	AMBIENT TEMPERATURE: 32°F MIN; 59°F AVG. 108°F MAX; 96-102°F AVG. RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

	WINTER	SUMMER
T	165	165
VB	9,074	8,663
VN	7,674	7,326

	WINTER	SUMMER
O_2	10.89	11.1
P	36	36
T	165	165
TP	127	131
VB	27,032	27,032
VN	22,815	22,815

ACC: S-24
TV: S-22

S23-01
S96-05
M | 150
1 ST
1 ST
S-83
S24-01
S24-01
S40-01
CO_2 - SYSTEM
VAPORIZATION
VB | 2,000
1 ST
S25-01
S26-01
S26-08
S26-05
S96-20
S-11
S10-01
COAL BIN
100 ST @50PCF 8%H20
S12-01
PET COKE BIN
100 ST @50PCF 8%H20
S13-01

	WINTER	SUMMER
T	165	165
VB	17,904	18,316
VN	15,141	15,490

S15-01
S14-01
S16-01
S17-01
10-12 ST
S27-01
S27-01
S27-01
FROM COMPRESSED AIR SYSTEM
FOR DRIVE HOISTING
MOBILE CRANE FOR HOISTING
S96-15
S-18

	WINTER	SUMMER
G	16.3	16.3
H	8	8

S19-01
S20-01
M | 20
S21-01
20 TPH
OPER. DESIGN
G | 7.5 | 9
TO PRECALCINER SHEET 004
S33-01
S30-01
TO KILN BURNER SHEET 004
OPER. DESIGN
G | 7.5 | 9
S96-01
FROM KILN I.D. FAN SHEET 004
M | 400
S31-01
S28-01
19/19

	WINTER	SUMMER
O_2	3.5	3.5
Q	2.83	2.54
T	716	716
VB	7,642	6,867
VN	3,435	3,087

	WINTER	SUMMER
T	276	265
VB	25,858	25,472
VN	18,576	18,576

TO TRUCK
S32-01
STANDBY S29-01
S29-01

NOTE: COAL MILL, DUCTS, COAL DUST BIN AND BAGFILTERS ARE DESIGNED FOR 50 PSIG.

POLYSIUS
Polysius Corp.
A ThyssenKrupp Technologies Company
Atlanta, Georgia

Attachment

Identification of Applicable Requirements – EU007

Applicable Requirements –
Emissions Unit 007: Coal and Petroleum Coke Grinding System

Note: Headings, Titles, and Federal Register Citations are for convenience and ease of identification, and do not imply specific applicability of entire sections. Applicable sections are identified by bullet list marks. Rule sections or subsections not listed are inapplicable to the facility or emissions unit.

Chapter 62, Florida Administrative Code

- 62-212.400(10)(b)
- 62-297.310(1)
- 62-297.310(2)
- 62-297.310(3)
- 62-297.310(4)
- 62-297.310(5)
- 62-297.310(6)
- 62-297.310(7)(a)4.a.
- 62-297.310(8)

Subpart LLL—National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

40 CFR 63.1340 Applicability and designation of affected sources.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72584, Dec. 6, 2002]

- 40 CFR 63.1340 (b) (7)

40 CFR 63.1348 Standards for affected sources other than kilns; in-line kiln/raw mills; clinker coolers; new and reconstructed raw material dryers; and raw and finish mills.
[64 FR 31925, June 14, 1999]

- 40 CFR 63.1348

40 CFR 63.1349 Performance testing requirements.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16619, Apr. 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1349 (b) (2)
- 40 CFR 63.1349 (c)

40 CFR 63.1350 Monitoring requirements.
[64 FR 31925, June 14, 1999, as amended at 64 FR 53070, Sept. 30, 1999; 67 FR 16620, Apr. 5, 2002; 67 FR 44769, July 5, 2002; 67 FR 72585, Dec. 6, 2002; 71 FR 76551, Dec. 20, 2006]

- 40 CFR 63.1350 (a) (4)
- 40 CFR 63.1350 (j)

40 CFR 63.1356 Exemption from new source performance standards.
[64 FR 31925, June 14, 1999, as amended at 67 FR 16622, Apr. 5, 2002; 71 FR 76552, Dec. 20, 2006]

- 40 CFR 63.1356 (b)