STATEMENT OF BASIS

E.I. Dupont De Nemours & Co.
Highland Metallic Mineral Processing Plant

Facility ID No.: 0070001
Bradford County

Initial Title V Air Operation Permit
FINAL Permit No.: 0070001-003-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of Title V Air Operation Permit and the incorporation of Construction Permit, No. 0070001-004-AC, issued simultaneously with this Title V Air Operation Permit Renewal.

Construction Permit, No. 0070001-004-AC removes the particulate matter emissions limit for the Ilmenite dryer (Emissions Unit 001) as it was based on Rule 62-296.320(4)(a), F.A.C. – Process Weight Table. It has been determined that the dryer is not subject to this regulation since the mineral sands do not undergo a chemical or physical change during the drying process.

In addition, this construction permitting action limits the sulfur dioxide emissions from the Ilmenite Dryer by restricting the sulfur content of the fuel oil fired, the hourly usage rate of the fuel oil fired, and the hours of operation per year.

Compliance Assurance Monitoring (CAM) does not apply to the dry cyclone at the Ilmenite dryer because it is used in product recovery.

Certain pieces of equipment associated with the product handling and transfer operations (Emissions Unit 002), are affected facilities pursuant to 40 CFR 60 Subpart LL-Standard of Performance for Metallic Mineral Processing Plants.

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

Based on the Title V permit application received December 20, 2002, this facility is not a major source of hazardous air pollutants (HAPs).

This facility is classified as a PSD Major facility due to the potential SO_2 emissions being above 250 TPY.