




Memorandum

Florida Department of Environmental Protection

TO: J. Charles Harp 
Program Administrator
Waste Management/Air Resources

THROUGH: Armando I. Sarasua, P.E. 
Air Permitting Supervisor

FROM: Howard Ard 
Permit Engineer

DATE: June 26, 2014

SUBJECT: Evaluation Summary for Title V Operation Permit Renewal for BASF Corporation, Quincy Operations, Title V air operation permit No. 0390005-019-AV, Gadsden County

We recommend issuing a Title V air operating permit renewal to BASF Corporation to operate their existing Quincy Operations, which is located in Gadsden County at 1101 North Madison Street in Quincy, Florida. This permit renews permit 0390005-014-AV, effective January 26, 2010, and incorporates the terms and conditions of permit No. 0390005-020-AC, which is being processed concurrently with this renewal.

Permit 0390005-020-AC authorizes changes to the operating rates and hours of operation for certain emission units. These changes are administrative and do not result in a change in emissions from this facility.

Process Description:

This facility processes Attapulgitic Clay and Fuller's Earth in two major production lines: Granular Processing and Gel Processing. Granular processing consists of crushing, drying, sizing and packing operations. Gel processing consists of crushing, extruding with additives, drying/milling, classifying and packing operations. Attapulgitic is a magnesium aluminum phyllosilicate, one of the types of fuller's earth, which occurs in a type of clay soil common to the Southeastern United States.

Pollution Control Equipment:

Emissions of particulate matter (PM) resulting from clay handling and processing are controlled by baghouses. Emissions from the natural gas fired or propane fired equipment (Granular Clay and Gel Clay fired equipment) are controlled by baghouses or scrubbers.

Environmental Impact:

Airborne Contaminant Emitted	F.A.C. Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	tons/yr	lbs/hr	tons/yr
PM	62-296.320, § 60.672	N/A	297	N/A	N/A
SO ₂	N/A	N/A	4.91	N/A	N/A
VOC	N/A	N/A	N/A	N/A	N/A
NO _x	62-212.400	N/A	N/A	N/A	124*
CO	N/A	N/A	53.9	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-297.620(4)	N/A	N/A	Not more than 5% opacity	

* Facility wide NO_x limit of 124 tons/yr.

Applicable Rules & Regulations:

BASF is subject to the following specific requirements:

- Rule 62-204.800: Adopts and incorporates requirements of 40 CFR 60 subpart OOO, NSPS for Nonmetallic Mineral Processing Plants, applicable to some of the emission units. Adopts Compliance Assurance Monitoring (CAM) Requirements.
- Rule 62-212: Preconstruction review. BASF exceeds PSD threshold for PM, and past construction permits have incorporated BACT for PM control.
- Rule 62-213: Major Sources. BASF is a major facility with limits from a prior Title V Operation permit.
- Rule 62-296.320: Process weight table for crushing/grinding activities.
- Rule 62-297.620: Allows 5% opacity as a compliance parameter for PM from baghouses.

Compliance Monitoring:

Compliance with emission point PM limits is demonstrated by compliance with the alternative visible emissions standard of 5 percent opacity. Compliance with building enclosure PM limits is demonstrated by compliance of each emission point enclosed within the building with the emission point PM limits. Compliance with the NO_x limit is demonstrated by tracking fuel usage by emissions unit and facility overall. For the emission units subject to CAM, the Permittee shall monitor and operate the control equipment (baghouses and scrubbers) as specified by the approved CAM Plan.

Compliance History:

A review of records shows the facility to be in compliance at time of inspection for the last five years, with one exception. For year 2013, the facility failed to comply with permit conditions due to incomplete/late reporting for years 2005 through 2012, in violation of CAM requirements. A letter was issued July 31, 2013, civil penalties were assessed and paid, and the case was resolved through Consent Order OGC File No 13-0996-20-AP.

Fee Summary:

The facility is a Title V source and therefore exempt from permitting fees. Emissions fees are required annually from Title V facilities

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