ExxonMobil Chemical Company
Cantonment Facility
Facility ID No.: 0330133
Escambia County

Air Operation Permit
Permit No.: 0330133-010-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
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[Electronic file name: 0330133-010-AO.doc]

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Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Permittee:
ExxonMobil Chemical Company

Permit No.: 0330133-010-AO
Facility ID No.: 0330133
SIC No(s).: 2821
Project: Air Operation Permit

This renewal permit is for the operation of the Cantonment Facility located at 604 Chemstrand Road in Cantonment, Escambia County; UTM Coordinates: Zone 16, 476.5 km East and 3384.6 km North; Latitude: 30° 35' 44" North and Longitude: 87° 14' 42" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or 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 following Appendices are attached as part of this permit:
Appendix G-1, General Conditions
Visible Emissions Test Plan

Effective Date: June 24, 2011
Renewal Application Due Date: April 25, 2016
Expiration Date: June 24, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/aj/c

Section I. Facility Information.

This is a renewal of Permit 0330133-009-AO, effective June 26, 2006. This permit underwent two modifications on December 13, 2006 and October 31, 2008 that incorporated Permits 0330133-005-AC and 0330133-008-AC.

During this renewal, changes were made to the visible emissions limit for Emission Units 007, 008 and 009. The previous 5% visible emissions limit was changed in this permit to 20% per the general facility-wide VE standard because there was no rule-based requirement for PM testing and thus no reason for a 5% VE limit in exchange for a waiver of PM testing as was written in previous permits.

Subsection A. Facility Description.

This facility produces thermoplastic elastomer with production lines 1 – 7. Inorganic filler, rubber bales and rubber compounding additives are pulverized and blended with plastic resins, oil and additives. Thermoplastic elastomer pellets are extruded, dried and packaged. Auxiliary process equipment consists of raw material storage silos, finished product preparation and storage silos, and finished product packaging equipment.

Based on the permit application received April 06, 2011, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
007	Emission points controlled by baghouses or filters
008	Emission points controlled by a scrubber
009	Uncontrolled emission points

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application (EPSAP No. 2845-1) received April 06, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices including covering all vats, container, etc., that are used for temporary and permanent storage of VOC and/or organic solvents. All equipment, pipes, hoses, lids, fitting, etc., shall be operated and maintained in such a manner to minimize leaks, fugitive emissions, and spills of VOC materials. [Rule 62-296.320(1), F.A.C.]

6. Potential to Emit. The maximum allowable facility-wide emissions are limited as follows:

Pollutant	Allowable Emissions
PM	6.51 tons/yr facility wide (12-month rolling total)
VOC	3.55 tons/yr facility wide (12-month rolling total)

Compliance shall be demonstrated in accordance with the facility-wide condition for Monitoring of Operations and Recordkeeping. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permits 0330133-005-AC and 0330133-008-AC]

7. The maximum allowable facility-wide operating rate is limited to 37,550 pound of raw material process input per hour. Compliance shall be demonstrated in accordance with the facility-wide condition for Monitoring of Operations and Recordkeeping. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Permit AC17-259666, construction permit 0330133-005-AC and Permit Applications Nos. 0330133-008-AC and 0330133-009-AO]

8. Rated Capacity for Emissions Testing. The maximum hourly operating rate for compliance testing of each individual or group of emission point(s) shall be as stated in the CONFIDENTIAL section of the approved Visible Emissions Test Plan. Permittee shall submit to the Department any proposed and/or revised changes to the Visible Emissions Test Plan. The Visible Emissions Test Plan shall contain enough verifiable details to provide reasonable assurance that the visible emissions test for each emission point is conducted while relevant production line(s) are operated at their maximum hourly operating rate. The Department-approved Visible Emissions Test Plan shall be included in the operating permit. [Rules 62-4.070, 62-4.160(2) and 62-210.200(PTE), F.A.C., and Permit 0330133-008-AC]

9. Monitoring of Operations and Recordkeeping. Records shall be maintained and made available for Department inspection identifying the monthly (calendar month basis) and 12-month rolling total emissions for each of the following pollutants: PM, VOC, HAP and formaldehyde. The monthly and 12-month rolling total values will be based on emission factors and calculations using Thermoplastics Elastomers (TPE) raw materials process input on a daily basis. The permittee is authorized to use the alternative emissions tracking method using facility-wide production input versus individual production line input as approved in the April 14, 2008 letter from the Department. [Rule 62-4.070, F.A.C.; construction permits 0330133-005-AC and 0330133-008-AC]

10. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. [Rule 62-4.090, F.A.C.]

11. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

12. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 3, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	**Brief Description**
007	Emission points controlled by baghouses or filters

This emissions unit includes bag filters and dust collectors for filler transfer systems, material preparation blenders and line operation. Potential emissions associated with these points are 6.08 tons/year Particulate Matter.

ID	DESCRIPTION	PM Emissions (TPY)
A1	Bag filter, filler transfer system for lines 1 & 2	0.60
A3	Bag filter, filler transfer system for lines 3 & 5	0.60
A6	Bag filter for line 6 material transfer	0.60
A7	Bag filter, filler transfer system for line 7	0.12
B1	Preparation Blender Dust collector for lines 1 & 2	0.66
B3	Preparation Blender Dust collector	0.66
B4	Dust collector for line 4	0.75
B6	Bag filter for line 6 material blending	0.66
B7	Masterbatch silo vent	0.60
B8	Preparation blender dust collector for line 7	0.23
J	Compounded rubber filter for lines 1 & 2	0.60

Total Emissions = 6.08 TPY PM

The following specific conditions apply to the emissions unit listed above:

A.1. The specific conditions of this emissions unit (EU 007) are listed in **Section D, Common Conditions**.

Test Methods and Procedures

A.2. This emissions unit shall be tested for opacity at least once per permitting cycle within 12 months of the permit renewal application due date on the emissions point deemed to have the highest opacity reading. [Rules 62-4.070, 62-297.310(7) and 62-297.401(9), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	**Brief Description**
008	Emission points controlled by scrubber

This emissions unit includes an extruder gas scrubber, emission point source ID I1, for Line 5. Potential emissions are estimated to be 0.44 TPY PM and 0.013 TPY VOC, primarily formaldehyde, a hazardous air pollutant.

ID	DESCRIPTION	PM (TPY)	VOC (TPY)
I1	Extruder gas scrubber for Line 5	0.44	0.013

The following specific conditions apply to the emissions unit listed above:

B.1. The specific conditions of this emissions unit (EU 008) are listed in **Section D, Common Conditions**.

Test Methods and Procedures

B.2. This emissions unit shall be tested for opacity at least once per permitting cycle within 12 months of the permit renewal application due date. [Rules 62-4.070, 62-297.310(7) and 62-297.401(9), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection C. **This section addresses the following emissions unit.**

E.U. ID No.	**Brief Description**
009	Uncontrolled emission points

This emissions unit includes various uncontrolled sources of VOC emissions. Potential emissions associated with these points are estimated to be 3.536 TPY VOC. Additional emission points associated with this permit are points C7, E7 and H7.

This emissions unit includes the following emissions points:

ID	Description	VOC Emissions (TPY)
C	Pellet Dryer Discharge for lines 1 – 5	2.190
C6	Pellet Dryer Discharge for line 6	0.548
C7	Pellet Dryer Discharge for line 7	0.548
D1	Pellet transfer vent for line 1	0.022
E1-6	Storage bin vents for lines 1 – 6	0.111
E7	Storage bin vents for line 7	0.039
G	Pellet packaging vent for Lines 1 – 6	0.026
H	Pellet transfer blowers for Lines 1 – 6	0.026
H7	Pellet transfer blowers for line 7	0.026
	Total	3.55 TPY VOC

The following specific conditions apply to the emissions unit listed above:

C.1. The specific conditions of this emissions unit (EU 009) are listed in **Section D, Common Conditions**.

Test Methods and Procedures

C.2. This emissions unit shall be tested for opacity at least once per permitting cycle within 12 months of the permit renewal application due date on the emissions point deemed to have the highest opacity reading. [Rules 62-4.070, 62-297.310(7) and 62-297.401(9), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection D. Common Conditions. This section addresses the following emissions unit.

E.U. ID
No. **Brief Description**
007 Emission points controlled by baghouses or filters

ID	DESCRIPTION	PM Emissions (TPY)
A1	Bag filter, filler transfer system for lines 1 & 2	0.60
A3	Bag filter, filler transfer system for lines 3 & 5	0.60
A6	Bag filter for line 6 material transfer	0.60
A7	Bag filter, filler transfer system for line 7	0.12
B1	Preparation Blender Dust collector for lines 1 & 2	0.66
B3	Preparation Blender Dust collector	0.66
B4	Dust collector for line 4	0.75
B6	Bag filter for line 6 material blending	0.66
B7	Masterbatch silo vent	0.60
B8	Preparation blender dust collector for line 7	0.23
J	Compounded rubber filter for lines 1 & 2	0.60

Total Emissions = 6.08 TPY PM

E.U. ID
No. **Brief Description**
008 Emission points controlled by scrubber

ID	DESCRIPTION	PM (TPY)	VOC (TPY)
I1	Extruder gas scrubber for Line 5	0.44	0.013

E.U. ID
No. **Brief Description**
009 Uncontrolled emission points

This emissions unit includes the following emissions points:

ID	Description	VOC Emissions (TPY)
C	Pellet Dryer Discharge for lines 1 – 5	2.190
C6	Pellet Dryer Discharge for line 6	0.548
C7	Pellet Dryer Discharge for line 7	0.548
D1	Pellet transfer vent for line 1	0.022
E1-6	Storage bin vents for lines 1 – 6	0.111
E7	Storage bin vents for line 7	0.039
G	Pellet packaging vent for Lines 1 – 6	0.026
H	Pellet transfer blowers for Lines 1 – 6	0.026
H7	Pellet transfer blowers for line 7	0.026
	Total	3.55 TPY VOC

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

D.2. Rated Capacity (each emission point). The maximum hourly operating rate for compliance testing of each individual or group of emission point(s) shall be as stated in the CONFIDENTIAL section of the approved Visible Emissions Test Plan. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

D.3. Visible Emissions. This emissions unit is subject to the General Visible Emission Standard (20% opacity). No scheduled testing is specifically required. With good reason the Department can require a compliance verification test, per the Facility-Wide Condition for Special Compliance Tests. [Rules 62-4.070, 62-296.320(4)(b)1 & 4, and 62-297.310(7)(b), F.A.C.]

Test Methods and Procedures

D.4. A special compliance test may be required. Test results must provide reasonable assurance that the source is capable of compliance with the standards of the Department at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for 30 minutes, except that emission point B6 of EU 007 shall be tested in accordance with DEP Method 22. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-297.310(7) and 62-297.401(9), F.A.C., and DEP letter dated April 22, 2011]

D.5. Test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

D.6. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations

D.7. Monitoring of operations and recordkeeping requirements shall be conducted in accordance with Facility-Wide Condition "Monitoring of Operations and Recordkeeping." [Rule 62-4.070, F.A.C.; Construction permits 0330133-005-AC and 0330133-008-AC]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.