Memorandum

Florida Department of Environmental Protection

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: June 23, 2011
SUBJECT: Evaluation Summary for ExxonMobil Chemical Company, Cantonment Facility 0330133-010-AO, Escambia County

We recommend issuing a permit to ExxonMobil Chemical Company to operate their Cantonment Facility. This permit follows 0330133-009-AO, effective June 26, 2006, which underwent two modifications on December 13, 2006 and October 31, 2008 to incorporate 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 i 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.

Process Description.
This facility produces thermoplastic elastomer with production lines 1 – 7. Inorganic filler, rubber bale 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.

Pollution Control Equipment.
PM emissions are controlled by dust collectors or a scrubber, with VOC emissions being emitted uncontrolled. The air pollution control equipment includes an additional baghouse for the filler transfer system and preparation blender system.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	N/A	N/A	6.51
VOC*	N/A	N/A	N/A	N/A	3.55
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

**VOC emissions are primarily formaldehyde, a hazardous air pollutant. However, this facility is not major for HAPs.*

Applicable Rules & Regulations.
This facility was subject to limitations as a result of construction permits AC17-259666, 0330133-005-AC and 03301330-008-AC that limited VE emissions to 5% opacity, but it appears to have no rule basis.

The 5% visible emissions limit was changed in this permitting action to 20% per the general facility-wide VE standard, Rules 62-296.320(4)(b)1. & 4., F.A.C.

Compliance Monitoring.
Monthly and twelve-month rolling total records of PM, VOC, HAPs, and formaldehyde emissions are required.

Compliance History.
Facility inspections from the 2006 - 2010 indicate compliance, with acceptable record keeping and no objectionable odors or visible emissions.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test for three emissions units ($1,000 x 3 = $3,000).

Additional Notes:
Previous permit 006-AO required testing prior to permit renewal, but permit 009-AO removed testing prior to permit renewal and only required special compliance testing, and also removed the 5% opacity to General VE opacity of 20%. This removal of testing was not mentioned in 008-AC. Therefore, permit fees should reflect EU 007 – $1,000; EU 008 – $1,000 and EU 009 – $750.00 only special compliance testing.

AMJ/c