



Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

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Lt. Governor

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Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Prime Conduit, Inc.
17962 NW U.S. Highway 441
High Springs, Florida 32643

Air Permit Number:0010039-008-AO
Date of Issue: December 07, 2011
Expiration Date: February 11, 2016

Authorized Representative:
Elbuth Medina, Plant Manager

Prime Conduit, Inc.
Non-Title V Air Operation Permit
AO Modification

PROJECT AND LOCATION

This is the air operation permit modification, which authorizes the incorporation of Permit No.0010039-006-AC for three PVC Decking Extruders and one PVC Decking Grinder for Prime Conduit Inc. a Polyvinyl Chloride (PVC) Manufacturing Facility (Standard Industrial Classification No. 3084). The facility is located in Alachua County at 17962 NW Highway 441 High Springs, Florida. The UTM coordinates are Zone 17, 347.0 km East; and 3299.6 km N.

This final permit is organized by the following sections:

<u>Section</u>	<u>Description</u>
Section 1	General Information
Section 2	Administrative Requirements
Section 3	Emissions Unit Specific Conditions
Section 4	Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution operation permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to operate the facility in accordance with the conditions of this permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida.



12/8/2011

Christopher L. Kirts, P. E.
District Air Program Administrator

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on December 8, 2011, to the persons listed below.

Elbuth Medina, Plant Manager. elbuth.medina@primeconduit.com
Jennifer Zavoda, Senior Consultant Kelly-Buck Company. jennifer.zavoda@kelly-buck.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to Section 120.52(7), Florida Statutes, with the
designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

12/8/2011
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Prime Conduit Inc. is a Polyvinyl Chloride (PVC) Manufacturing Facility in High Springs Florida. The facility consists of a PVC blending, pipe extrusion and decking processes that include storage silos, weigh hoppers, weigh scales, surge hoppers, mixing tanks cooling unit, PVC pipe extrusion and decking lines, regrind silos, ink-jet printer and PVC scrap and decking grinders.

The facility processes raw materials such as PVC Resin and Calcium Carbonate along with minor additive ingredients such as wax, which aid in the extrusion process, stabilizers that protect the conduit from thermal and ultraviolet radiation and colorants to produce rigid Polyvinyl Chloride (PVC) pipes used as a conduit for electrical and telecommunication cable applications.

Primary blend ingredients, PVC Resin and Calcium Carbonate are delivered to the facility via rail car or trucks. PVC Resin is transferred via a vacuum pull pac system where the material is collected in a vacuum receiver equipped with a fabric filter system and fed into a positive pressure air conveying system and transferred to storage silos. Calcium Carbonate is transferred via a blower from rail car or truck to storage silos. Each storage silo exhaust vent is equipped with a fabric filter baghouse.

Primary blend ingredients are pneumatically transferred from the storage silos to weigh hoppers located overhead in the blend tower area. Minor ingredients are transferred from bags to a separate weigh hopper. Each weigh hopper is equipped with a fabric filter baghouse venting inside the blend tower. The materials are then gravity fed to the surge hopper. From the surge hopper the materials along with colorants and stabilizers are then transferred to a mixer for blending. Agitation of raw materials generates a moderate amount of heat during the blending process. After blending the compound is transferred by gravity to a cooling unit, which uses a heat exchanger to slowly cool the blended compound. The surge hopper, mixing tank and cooling unit are all vented to a single baghouse which exhausts outside the blend unit. The blended compound is then transferred pneumatically to compound storage silos and then to a feed hopper above one of eight rigid pipe extrusion lines or to three decking extruders. Each extruder is equipped with a cyclone separator and baghouse for recovery and reuse of blended PVC compound entrained in exhaust air during transfer. The filtered exhaust from the cyclone separator and baghouse is vented outside.

Blended compound not meeting product specification is pneumatically routed from the cooler to a rerun storage silo to be transferred back to a rerun receiver bin for reuse in the process.

Air exhausts from grinders are routed to a regrind silo for recovery of airborne PVC for reuse.

The final blended PVC compound is then fed through a crammer screw into extruders which use heat and pressure to liquefy the blended compound and force it through a die in the size of pipe desired. The pipe is then cooled in a water bath and then labeled via a non-contact ink-jet printer and cut to length. Finished products are bundled and packaged for shipment.

The facility has the potential to emit particulate Matter (PM₁₀), insignificant amounts of HAP (vinyl chloride) and VOCs. The primary source of PM₁₀ emissions is from Calcium Carbonate. The facility uses reasonable precautions, as needed to control fugitive emissions in accordance with the requirements of Rule 62-296.320(4)(c), F.A.C. - Unconfined Emissions of Particulate Matter.

SECTION 1. GENERAL INFORMATION

The facility consists of the following permitted emissions unit.

Facility ID No. 0010039	
EU No.	Emission Unit Description
001	PVC blending and pipe extrusion process with scrap grinder
E P	Brief Description
01	Vacuum Pull Pac Sys with baghouse (1A)
02	PVC Resin Storage silo with baghouse (1B)
03	CaCO3 Storage silo with baghouse (1C)
04	Receiver Bin with baghouse (1D)
05	Minor ingredient bin with baghouse (1Da)
06	Weigh scale with baghouse (1E)
07	Surge hopper with baghouse (1F)
08	Blend storage silo with baghouse (2A)
09	8 PVC pipe extruders each with cyclone/baghouse (2B)
010	Re-run silo with baghouse (2C)
011	PVC pipe scrap grinder with cyclone separator bag house
012	3 PVC decking extruders each with cyclone/baghouse
013	PVC decking scrap grinder ¹

¹The facility shall provide written notification to the Department of the date of completion of installation as specified by Permit No. 0010039-006-AC.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Northeast District Office, Air Resource Management. The Permitting Authority's mailing address and telephone number are: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590; Telephone: 904/256-1700. All documents related to applications for permits shall be submitted to the Permitting Authority.
2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Northeast District Office, Air Resource Management. The Compliance Authority's mailing address and telephone number are: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256; Telephone: 904/256-1700. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Compliance Authority.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions;
 - d. Appendix D. Common Testing Requirements
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1), and 62-212.300, (1) (a), F.A.C.]
7. The ID Number and Project Name for this source shall be used on all correspondences.
8. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
[Rule 62-210.700(5), F.A.C.]
9. A completed Application for Non Title V Air Permit Renewal (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

[Rule 62-4.090, F.A.C.] [Rules 62-4.055 and 62-4.220, F.A.C.]

**SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS
PVC Blending and Pipe Extrusion With Grinders**

This section of the permit addresses the following emissions units and points.

Facility ID No. 0010039	
EU No.	Emission Unit Description
001	PVC blending and pipe/decking extrusion process with scrap grinders
E P	Brief Description
01	Vacuum Pull Pac Sys with baghouse (1A)
02	PVC Resin Storage silo with baghouse (1B)
03	CaCO3 Storage silo with baghouse (1C)
04	Receiver Bin with baghouse (1D)
05	Minor ingredient bin with baghouse (1Da)
06	Weigh scale with baghouse (1E)
07	Surge hopper with baghouse (1F)
08	Blend storage silo with baghouse (2A)
09	8 PVC pipe extruders each with cyclone/baghouse (2B)
010	Re-run silo with baghouse (2C)
011	PVC pipe scrap grinder with cyclone separator bag house
012	3 PVC decking extruders each with cyclone/baghouse
013	PVC decking scrap grinder

EQUIPMENT

1. PVC blending and pipe/decking extrusion with grinders: The permittee is authorized to operate a PVC blending and pipe/decking extrusion process. The facility includes unloading areas; storage silos, weigh hopper weigh scales, bins extruders and grinders.

[Permit No. 0010039-006-AC]

PERFORMANCE RESTRICTIONS

2. Hours of Operation: The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 hours per year.

[Rules 62-4.160(2), F.A.C, and Rule 62-210.200(PTE), F.A.C., Definitions- Potential to Emit (PTE)]

3. Maximum Throughput Blending Unit: The maximum throughput rate of blended PVC material shall not exceed 15000 lbs per hour.

[Rule 62-210.200(PTE), F.A.C., Permit No. 0010039-006-AC]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS
PVC Blending and Pipe Extrusion With Grinders

4. Control Units: All particulate matter emissions control units shall remain in place at all times during operation. If there is a malfunction on the control units, the owner or operator shall shutdown the baghouse fan immediately to minimize excess emissions.

[Rule 62-4.070(3) and 62-210.700(1) F.A.C.]

5. Unconfined Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of material; construction, alteration, demolition or wrecking; or industrially activity such as loading, unloading, storing and handling; without taking reasonable precaution to prevent such emissions. Reasonable precautions may include but are not limited to the followings, as necessary:

- a. The application of water as needed to open aggregate piles, unpaved roads, and work yards to control unconfined emissions generated by vehicular traffic or wind.
- b. Removal of particulate matter from paved areas.

[Rule 62-296.320(4)(c), F.A.C.]

EMISSIONS STANDARDS

6. General Visible Emissions Standard: No person shall cause, let, permit, suffer or allow to be discharge into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity.

[Rule 62-296.320(4)(b)1., F.A.C.]

7. 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 standard contained in a Department rule or in a permit issued to those rules is being violated, it shall require the owner or operator of the emission unit to conduct compliance tests which identify the nature and the 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.]

TEST METHODS AND PROCEDURES

8. Visible Emissions Test: Compliance shall be determined by EPA Method 9, upon the Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.
The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations.

[Rule 62-296.320(4), F.A.C.]

Permitting Note: The emissions unit does not require regularly scheduled VE performance testing, since the applicable visible emission limitation is a facility-wide limitation and there is not an applicable allowable mass emission limitation. However, a visible emissions opacity test may be required at these Emissions Points upon Department request pursuant to the Special Compliance Test requirements of Rule 62-297.310(7)(b), F.A.C. (refer to Appendix D, Condition 4 of this permit).

[Rule 62-297.310(7)(a)4.a., F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS
PVC Blending and Pipe Extrusion With Grinders

9. Permitted Capacity. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operation does not exceed 100 percent of the maximum operation rate allowed by the permit. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2), F.A.C.]

NOTIFICATION, RECORDKEEPING AND REPORTING REQUIREMENTS

10. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(8), F.A.C.]

11. Control Units/Maintenance Record: The owner or operator shall maintain the malfunction and maintenance records of all control units. The record(s) shall be kept on site for at least 5 years, and shall be made available upon Department's request.

The following information shall include but not be limited to:

- a. Date and type of malfunctions that occurred.
- b. Duration of the malfunction and correction action taken.
- c. Maintenance conducted as a result of malfunction

[Rule 62-4.070(3) 62-210.700(1), F.A.C.]