



Florida Department of Environmental Protection

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PERMITTEE:

Sanderson Pipe Corporation
One Enterprise West
Sanderson, Florida 32087

I.D. Number: 0030008
Permit/Cert Number: 0030008-011-AO
Date of Issue: December 2, 2008
Expiration Date: October 6, 2013
County: Baker
Latitude/Longitude: 30°15'24"N; 82°15'05"W
UTM: E-(17)379.61; N-3347.71
Project: PVC Pipe Manufacturing

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-204, 62-296, 62-297 and 62-4. 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 department and made a part hereof and specifically described as follows:

PROJECT 011: For the renewal of Air Operation Permit No. 0030008-008-AO. This permit also incorporates Permit No. 0030008-010-AO.

FACILITY DESCRIPTION

This facility manufactures polyvinyl chloride (PVC) pipe by extruding a mixture of PVC Resin, mineral oil-based stabilizer, calcium carbonate (drying agent), filler, titanium dioxide (UV protection), and wax. The total maximum production throughput rate of this facility is 354,780 tons per year of PVC compound.

The facility has a rail spur located on site where PVC resin is delivered to the facility via railcar. The facility has two (2) vacuum, railcar unloading systems located at the rail spur, however only one system can be operated at a given time. Each railcar unloading system has a bin vent filter to control particulate matter emissions.

PVC resin is pneumatically transferred by one of the railcar unloading systems to the PVC Resin Storage Silo. Particulate matter emissions from this silo are controlled by a Bin Vent Filter (EU 001, EP 01). From the PVC Resin Storage Silo, PVC resin is pneumatically transferred to the weigh scale located in the Blending Building.

Calcium carbonate (CaCO_3) is delivered to the plant in large superbags. The bags are lifted by an elevator and dumped into a weigh scale before being emptied into one of three 10,000 pound capacity mixers along with the PVC resin other additives. The facility calls this activity the "filler operation". The fugitive particulate matter from the unloading of the CaCO_3 , and that generated at the weigh scales and the mixers are controlled by two (2) baghouses manufactured by Flex-Kleen (EU 003).

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During the mixing process, the mixed compound is raised to a temperature of approximately 200 °F where it flows by gravity to the Ready Hopper. Once the Ready Hopper is filled, the mixed compound is transferred to the Blenders (three water jacketed Coolers) where it is cooled to approximately 115 °F.

The particulate matter emissions generated during the blending process are also controlled by the two Flex-Kleen baghouses (EU 003). The baghouses are manually operated and generally operated so that one is on standby while the other one is in operation. However, if two or more of the three blenders are in simultaneous operation, and/or the filler operation is in process, then the second baghouse is manually operated so that both baghouses operate simultaneously in series.

From the Blender (Cooler), the PVC compound is pneumatically transferred to the Surge Hopper and then to one of eight PVC Compound Storage Silos. One of the facility's PVC Compound blends contain an additive that tends to clump. When this particular blend is produced, it is placed in the Day Bin Silo where any potential lumps are removed in the built-in shaker prior to being transferred to one of the PVC Compound silos. The eight PVC Compound Silos and the Day Bin are each controlled by a Bin Vent Filter (EU 001, EP 02- 10).

From PVC Compound Silos, the blended PVC compound mix is transferred to the pipe manufacturing plant where it is heated and extruded into PVC pipe of various sizes.

Off-specification pipe is ground and fed back into the process. The off-specification pipe is ground into chips by one of two grinders. From the grinders, the chips, along with the dust generated from the grinding process, are fed into one of three pulverizers and formed into a fine powder that is reused in the process. Particulate matter emissions from this operation are controlled by a separate baghouse collector (EU 002).

EMISSION UNITS/ACTIVITIES EXEMPTED FROM AIR PERMITTING:

The potential particulate matter emissions from the two, railcar unloading systems located at the rail spur qualify for the Generic Emission Unit Exemption of Rule 62-210.300(3)(b)1., F.A.C.

Although not considered to be a significant source of air emissions, this activity is subject to any general, facility-level applicable requirements.

FACILITY REGULATED EMISSION UNITS:

The estimated potential emissions are for informational purposes only and either provided in previous air permit applications or in Department files, for all emission sources permitted to operate at this facility. The total combined potential emissions are below the thresholds that would require Title V permitting in accordance with Chapter 62-213, F.A.C.

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Emissions Unit ID Number	Emission Point ID Number	Emissions Unit Description	Control Device	Particulate Matter Emissions (Tons/Year)
001	EP-01	PVC Resin Silo	Bin Vent Filter ¹	0.451 ²
	EP-02	PVC Compound Storage Silo 1	Bin Vent Filter ¹	0.451 ²
	EP-03	PVC Compound Storage Silo 2	Bin Vent Filter ¹	0.451 ²
	EP-04	PVC Compound Storage Silo 3	Bin Vent Filter ¹	0.451 ²
	EP-05	PVC Compound Storage Silo 4	Bin Vent Filter ¹	0.451 ²
	EP-06	PVC Compound Storage Silo 5	Bin Vent Filter ¹	0.451 ²
	EP-07	PVC Compound Storage Silo 6	Bin Vent Filter ¹	0.451 ²
	EP-08	PVC Compound Storage Silo 7	Bin Vent Filter ¹	0.451 ²
	EP-09	PVC Compound Storage Silo 8	Bin Vent Filter ¹	0.451 ²
	EP-10	Day Bin Silo	Bin Vent Filter ¹	0.451 ²
002		PVC Regrind System	Baghouse ³	9.084 ⁴
003	EP-01	Weigh Scale and Mixers Baghouse 1	Baghouse ⁵	1.689 ⁶
	EP-02	Weigh Scale and Mixers Baghouse 2	Baghouse ⁵	1.689 ⁶
Facility-Wide Total Potential Particulate Matter Emissions				16.972

- ¹ Premier Pneumatics Bin Bag Filter, Model BVC-G-25-5S. Pulse-Jet cleaning, 25 bags, 250 ft² total filter area, 2.4:1 Air to Cloth Ratio, and estimated control efficiency of 99.9%.
- ² Potential emissions calculated using vendor guarantee of 0.02 gr/dscfm, and 600 ACFM air flow for each Bin Vent Filter.
- ³ Donaldson Torit Model HPT96 Baghouse Collector. Pulse Jet Self-Cleaning, 96 bags, 954 ft² total filter area, 12.7:1 Air to Cloth Ratio, ± 17" W.G design pressure differential; Estimated control efficiency of 99.9%.
- ⁴ Potential emissions calculated using vendor guarantee of 0.02 gr/dscfm, and 12098 ACFM air flow for Baghouse.
- ⁵ Flex Kleen Model WSBS 49 Baghouse. Reverse Pulse-Jet cleaning, 49 bags, 622 ft² total filter area, 3.6:1 Air to Cloth Ratio, ± 20" W.G design pressure differential, and estimated control efficiency of 99.9%.
- ⁶ Potential emissions calculated using vendor guarantee of 0.02 gr/dscfm, and 2250 ACFM air flow for each Baghouse.

REGULATORY CLASSIFICATION

This facility is subject to regulation under Rule 62-296.320(4), F.A.C. for Unconfined Particulate Matter and Visible Emissions, and Rule 62-210.300(1)(a), F.A.C., Permits Required. In addition, Rule 62-297.620(4) - Exceptions and Approval of Alternate Procedures and Requirements has been applied to the two Flex-Kleen baghouses (EU 003, EP 01 and EP 02).

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OPERATING LOCATION

Located at One Enterprise West, east of State Road 229, Sanderson, Baker County, Florida.

APPENDICES

The attached appendices are a part of this permit:

Appendix A - Baghouse Operation and Maintenance Plan

FLOW DIAGRAMS

The attached flow diagrams are for informational purposes only:

Block Flow Diagram of Facility Process

PERMIT HISTORY:

Air Construction Permit No. 0030008-001-AC	issued December 29, 1997
Time Extension of Permit No. 0030008-001-AC	issued September 2, 1998
Transfer of Ownership	issued October 6, 1998
Air Operation Permit No. 0030008-003-AO	issued February 2, 1999
Air Construction Permit No. 0030008-004-AC	issued September 1, 2000
Air Operation Permit No. 0030008-005-AO	issued October 16, 2000
Air Construction Permit No. 0030008-006-AC	issued April 3, 2002
Air Operation Permit No. 0030008-007-AO	issued April 3, 2002
Air Operation Permit No. 0030008-008-AO	issued January 26, 2004
Air Construction Permit No. 0030008-009-AC	issued July 11, 2008
Air Operation Permit No. 0030008-010-AO	issued October 6, 2008

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit - Non-Title V Source received 10-13-08

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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 the 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 not 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 no 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 permitted 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, as 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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the 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.

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County: Baker

GENERAL CONDITIONS:

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 non-compliance; and
- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which 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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the 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, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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14. 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 measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. 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 that 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.

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SPECIFIC CONDITIONS:

The following specific conditions apply to the Emissions Units and Emission Points listed below:

Emissions Unit	Brief Description
001	PVC Compound Mixture Operations. Emissions unit includes the PVC Resin Silo, eight PVC Compound Storage Silos, and the Day Bin Silo (EP 01- EP 10). Particulate matter emissions at each silo are controlled by a bin vent filter.
002	PVC Regrind Operation. Particulate matter emissions are controlled by a baghouse.
003	Weigh Scale and Mixers with two baghouses for particulate matter emission control (EP 01 and EP 02)

OPERATIONAL PARAMETERS

1. **Hours of Operation:** The hours of operation of each emissions unit are not restricted (8,760 hr/year).

[Rule 62-210.200(PTE), F.A.C.]

2. **Permitted Capacity:**

- a. **Production Rate** – The nominal production rate of PVC Compound Mix from this facility is 354,780 tons in any consecutive twelve (12) month period¹.
- b. **PVC Regrind** – The nominal throughput rate at the PVC Regrind Operation is 6,000 pound per hour and 26,280 tons per year².
- c. **Weigh Scale/Mixers** – The nominal unloading rate of CaCO₃ and Additives (Filler Operation) is 14, 541 pounds per hour³.

¹ Based on 81,000 lbs/hr production rate. This hourly rate is not intended to be a permit limitation.

² As stated in Construction Permit No. 0030008-004-AC, these rates are for informational purposes only and not intended to be a permit limitation.

³ Rate of CaCO₃ and Additives added to all three mixers simultaneously. Rate for single mixer is approximately 4,847 pounds per hour on a daily average production basis. This rate is the total material unloaded daily divided by the actual hours of operation

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0030008-004-AC; Construction Permit No. 0030008-009-AC]

PERMITTEE:

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One Enterprise West
Sanderson, Florida 32087

I.D. Number: 0030008
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Date of Issue: December 2, 2008
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County: Baker

SPECIFIC CONDITIONS:

3. **PVC Compound Mixture Operations (EU 001) - Control Equipment:** The Bin Vent Filters at each of the silos (EP 01 through EP 10) shall be in operation during any time the PVC Compound Mixture Operations is being utilized. The bin vent filters shall be operated according to the manufacturer's specifications and recommendations, and in a manner to achieve at least the emission standards specified in this permit.

[Rule 62-4.070, F.A.C.]

4. **PVC Regrind Operation (EU 002) - Control Equipment:** The baghouse shall be in operation during any time the PVC Regrind Operation is being utilized. The baghouse shall be operated according to the manufacturer's specifications and recommendations, and in a manner to achieve at least the emission standards specified in this permit.

[Rule 62-4.070, F.A.C.]

5. **Weigh Scales and Mixers(EU 003) - Control Equipment:** To control particulate matter at the Weigh Scales and Mixers, and the fugitive particulate matter generated in the Blending Building, the baghouses (EP 01 and 02) shall be in operation as specified below in order to achieve at least the emissions standards specified in this permit:

- a. Mode 1 - One Blender is in operation w/o Filler Operation: One of the two baghouses shall be in operation with the other on stand-by.
- b. Mode 2 - Two or Three Blenders in operation w/o Filler Operation: The two baghouses shall be in operation in series.
- c. Mode 3: - Any number of Blenders in operation w/Filler Operation: The two baghouses shall be in operation simultaneously in series.

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

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

6. **Weigh Scales and Mixers (EU 003) -Particulate Matter:** Estimated particulate matter emissions from each of the baghouses (EP 01 and 02), based on the vendor guarantee, is no more than 0.02 gr/acfm.

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

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One Enterprise West
Sanderson, Florida 32087

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County: Baker

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7. **Weigh Scales and Mixers (EU 003)-Visible Emissions:** Each of the Flex-Kleen baghouses (EP 01 and 02) shall be operated such that Visible emissions from each of these emission points shall not exceed 5 percent opacity.

[Rule 62-297.620(4), F.A.C.; Rule 62-4.070(3), F.A.C.]

8. **General Visible Emissions Standard:** Except for emissions unit 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 discharge 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 Ringelmann Chart (20% opacity). The Permittee shall conduct a compliance test upon Department request in accordance with the requirements of Specific Condition No. 15. The test method shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rule 62-296.320(4)(b) 1., F.A.C.; Rule 62-4.070, F.A.C.]

9. **Unconfined particulate matter:** All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, yard operations, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but are not limited to the following:

- Reduced speed for vehicular traffic
- Use of dust suppressants or wetting agents
- Use of paving or other asphaltic materials
- Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping.
- Covering of trucks, trailers, front-end loaders and other vehicles or containers to prevent spillage of particulate matter during transport.
- Use of mulch, hydro seeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown
- Use of hoods, fans, filters and similar equipment to contain, capture and vent particulate matter
- Enclosure or covering of conveyor systems
- Sprinkling or otherwise wetting of conveyor systems

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

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10. **Volatile organic compounds emissions or organic solvents 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 or systems deemed necessary and ordered by the Department. Procedures to minimize VOC emissions shall include, but not limited to:
- a. Maintain tightly fitting cover, lids, etc. on all containers of materials containing VOC when they are not being handled, tapped, etc.
 - b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use.
 - c. All fittings, valves, lines, etc., shall be properly maintained.
 - d. All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.

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

11. **Objectionable Odor:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(219), F.A.C., Definitions-Objectionable Odor]

TEST METHODS AND PROCEDURES

12. **Weigh Scales and Mixers (EU 003) - Particulate Matter:** Each baghouse (EP 01 and EP 02) shall be assumed to be in compliance with the Particulate Matter emission estimate stated in Specific Condition No. 6 if each of the emission points complies with the Visible Emissions limitations stated in Specific Condition No. 7. The permittee shall also conduct a compliance test upon Department request in accordance with the requirements of Specific Condition No. 15. The test method shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C.

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

13. **Weigh Scales and Mixers (EU 003) - Visible Emissions:** The Visible Emissions test method shall be EPA Method 9, incorporated in Chapter 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. Compliance tests shall be conducted at each baghouse (EP 01 and EP 02) on an annual basis, at least once each federal fiscal year (October 1 - September 30).

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

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14. **EPA Method 9- Required Sampling Time:** The required minimum period of observation for each compliance test shall be thirty (30) minutes or, if the operation is normally completed in less than 30 minutes and does not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rules 62-297.310(4)(a)2 and (4)(a)2.a., F.A.C.]

15. **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 pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which 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.]

16. **Compliance Test Procedures:** Compliance test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

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

17. **Operation During Compliance Test:** Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity (stated in Specific Condition 2). 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. 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

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

EQUIPMENT REQUIREMENTS

18. **Required Equipment:** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

[Rule 62-297.310(5)(a), F.A.C.]

PERMITTEE:

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Permit/Cert Number: 0030008-011-AO
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County: Baker

SPECIFIC CONDITIONS:

19. **Accuracy of Equipment:** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5)(b), F.A.C.]

20. **Control Equipment:** Control equipment shall be provided with a method of access that is safe and readily accessible.

[Rule 62-297.310(6), FAC.]

21. **Circumvention of Control Devices:** No person shall circumvent any air pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

22. **Control Devices Operation and Maintenance Plan (EU 003):** The baghouses shall be inspected and maintained in accordance with the recommendations developed for the equipment by the vendor and stated in the Operation and Maintenance Plan received April 11, 2008. Inspection and maintenance documentation shall be retained at the facility for at least 3 years from the date of measurement or recording, and be readily assessable for onsite review by the Department. Documentation shall include, but is not limited to the following:

- A. Monthly record of the pressure drop (in H₂O) across the baghouse during normal operation;
- B. Inspection and maintenance of the baghouse cleaning system to minimize particulate buildup or caking on the filter bags;
- C. Inspection and replacement, as needed, of the baghouse bags. Bags should be checked for any tears, holes, abrasions, and scuffs;
- D. Date of maintenance and the observations were performed;
- E. What maintenance and observations were performed;
- F. Name and title of the personnel performing the maintenance/inspections/observations.

[Rule 62-4.070(3), F.A.C.; Rule 62-4.160(7), F.A.C., Rule 62-4.160(14)(b), F.A.C.; Construction Permit No. 0030008-009-AC]

PERMITTEE:

Sanderson Pipe Corporation
One Enterprise West
Sanderson, Florida 32087

I.D. Number: 0030008
Permit/Cert Number: 0030008-011-AO
Date of Issue: December 2, 2008
Expiration Date: October 6, 2013
County: Baker

SPECIFIC CONDITIONS:

EXCESS EMISSIONS

23. **Excess Emissions -Allowed:** Excess emissions resulting from startup, shutdown, or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

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

24. **Excess Emissions -Prohibited:** Excess Emissions which are cause entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

NOTIFICATIONS, RECORDKEEPING AND REPORTING REQUIREMENTS

25. **Compliance Test Notification:** At least 15 days prior the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of this Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.

[Rule 62-297.310(7)(a)9., F.A.C.]

26. **Compliance Test Report Submittals:** Reports of the required compliance tests shall be filed with the Air Compliance Section of this Office as soon as practical but no later than 45 days after the last test is completed.

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

27. **Excess Emissions - Malfunctions:** In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

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28. **Plant Operation - Problems:** If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

29. **Operations and Processing Rate Records.** In order to demonstrate compliance with the requirements in Specific Conditions 1. through 5. of this permit, the permittee shall maintain a log at the facility of at least the following information:

- (a) Tons of PVC Compound Mix produced on a monthly basis
- (b) Tons of PVC Compound Mix produced per consecutive 12-month period
- (c) Total pounds of CaCO₃, Additives, and Filler unloaded into Weigh Scales and Mixers
- (d) Hours of CaCO₃, Additives, and Filler unloading
- (e) Daily average of CaCO₃, Additives, and Filler unloading in pounds per hour
- (f) Number of Blenders in operation
- (g) Filler Operation
- (h) Number of Baghouses in operation (EU 003)

This information shall be retained for at least 3 years from the date of measurement or recording, and be readily assessable for onsite review by the Department.

[Rule 62-4.070(3), F.A.C.; Rule 62-4.160(7), F.A.C., Rule 62-4.160(14)(b), F.A.C.; Construction Permit No. 0030008-009-AC]

30. **Reporting:** The permittee shall submit a report of the information required in Specific Condition 29 with the Application for Non Title V Air Permit Renewal (Operation Permit application) required in Specific Condition No. 39. The reporting period shall be for the calendar year prior to application submittal.

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

ADMINISTRATIVE

31. The ID Number and Project Name for this source shall be used on all correspondences.

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32. **Definitions:** Rules 62-210.200(159), (230) and (245), F.A.C. define the following terms.

- a. *Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- b. *Shutdown* is the cessation of the operation of an emissions unit for any purpose.
- c. *Malfunction* is defined as any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

[Rule 62-210.200(159), (230), and (245), FAC.]

33. **Applicable Regulations:** The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.

[Rule 62-210.300, F.A.C.]

34. **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(1), F.A.C.]

35. **General Conditions:** The owner and operator is subject to and shall operate under the General Permit Conditions 1 through 15 of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.

[Rule 62-4.160, F.A.C.]

36. **Construction Permit Required:** Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

[Rule 62-210.300(1)(a), F.A.C.]

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37. All reports, tests, notifications or other submittals required by this permit shall be submitted to the:

Department of Environmental Protection
Northeast District - Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/807-3300
Fax: 904/448-4366

38. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

39. 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.

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

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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