Florida Department of Environmental Protection

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Sanderson Pipe Corporation
One Enterprise West
Sanderson, Florida 32087

Authorized Representative:
Steve Shumate, Plant Manager

Air Permit No. 0030008-012-AC
Permit Expires: December 3, 2011

Minor Source Air Construction Permit
Project Name: Replace EU003 baghouses with EU004 Dust Collector

This is the final air construction permit, which authorizes the replacement of EU003 baghouse with EU004. The proposed work will be conducted at the Sanderson Pipe Corporation, which is a PVC Pipe Manufacturing (Standard Industrial Classification No. 3084). The facility is located in Baker County, at One Enterprise West, East of State Road 229 in Sanderson, Baker County, Florida. The UTM coordinates are Zone 17, 379.61 km East, and 3347.71 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

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 construction 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 conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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

12/3/2010

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 Final Determination 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 3, 2010 to the persons listed below.

Steve Shumate, Plant Manager, Sanderson Pipe Corporation (steve-s@sandersonpipe.com)
George Whitmer, Whitmer Environmental Services, Inc. (George@whitmerenv.com)
Stephen Alexander, Whitmer Environmental Services, Inc. (steveair57@yahoo.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.

12/3/2010

(Clerk)

(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

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 one baghouse manufactured by Donaldson Torit Dust Collectors (EU 004).

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 Donaldson Torit Dust Collectors baghouse (EU 004). The baghouse is manually operated.

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. The following table (for informational purposes) contains estimated potential particulate matter emissions either provided in previous air permit applications or in Department files, for the emission sources permitted to operate at this facility. **The EU(s) affected by this project consists of the following:**

Emissions Unit ID Number	Emission Point ID Number	Emissions Unit Description	Control Device	Particulate Matter Emissions (Tons/Year)
003	EP-01	Weigh Scale and Mixers Baghouse 1	Baghouse [1]	1.689 [2]
004	EP01	Weigh Scale and Mixers	Dust Collector [3]	1.41[3]

[1] Flex Kleen Model WSBS 49 Baghouse. Reverse Pulse-Jet cleaning, 49 bags, 622 ft^2 total filter area, 3.6:1 Air to Cloth Ratio, ± 20" W.G design pressure differential, and estimated control efficiency of 99.9%.

[2] Potential emissions calculated using vendor guarantee of 0.02 gr/dscfm, and 2250 ACFM air flow for each Baghouse.

[3] Model DFO 2-12 Cartridge Dust Collector by Donaldson Torit Dust Collectors. Potential emissions calculated using vendor guarantee of 0.005 gr/dscfm, and 7500 ACFM air flow for Baghouse.

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.

The facility is regulated under Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards. The installation of EU 005 is subject to regulation under Rule 62-210.300(1)(a), F.A.C., Permits Required. In addition, Rule 62-297.620(4), F.A.C.- Exceptions and Approval of Alternate Procedures and Requirements has been applied to the baghouse.

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Northeast District Office, Air Permitting Section. The Permitting Authority's mailing address and telephone number are: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590; Telephone: 904/807-3300. 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: 904/807-3300. 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; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and 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, 62-213, 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: The permittee shall notify the Compliance Authority upon commencement of construction. 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. Application for Non Title V Permit Operation: This permit authorizes construction of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit (DEP Form No. 62-210.900(3), F.A.C.) at least 60 days prior to expiration of this permit. To apply for a Non-Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

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

9. The I.D. No. and Project name for this source shall be used on all correspondence.

This section of the permit addresses the following emissions units.

003	Weigh Scale and Mixers with (EP 01) Flex Kleen Model Baghouse & (EP 02) Reverse Pulse-Jet Baghouse
004	Weigh Scale and Mixers with a Cartridge Dust Collector for particulate matter emission control (EP 01)

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 (EU005) Cartridge Dust Collector.

Equipment

1. **Cartridge Dust Collector (EU004)**. The permittee is authorized to install a Cartridge Dust Collector to replace the two dust collectors under EU003.

[Application No. 0030008-012-AC]

2. **Relation to Other Permits.** The conditions of this permit will supplement and comply with conditions of all existing, valid, Department permits.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

PERFORMANCE RESTRICTIONS

3. **Hours of Operation**. This permit does not change any or establish any new operating hours. The hours of operation of each emissions unit are not restricted (8,760 hr/year).

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

4. **Permitted Capacity.** This permit does not change any or establish any new permitting capacities or emissions limits for these EUs.

   a. **Production Rate** – The nominal production rate of PVC Compound Mix from this facility is 354,780 tons in any consecutive twelve (12) month period[1].

   b. **PVC Regrind** – The nominal throughput rate at the PVC Regrind Operation is 6,000 pound per hour and 26,280 tons per year[2].

   c. **Weigh Scale/Mixers** – The nominal unloading rate of $CaCO_3$ and Additives (Filler Operation) is 14, 541 pounds per hour[3].

[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.

Specific Condition No. 4 continued:

[3] Rate of $CaCO_3$ 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]

5. **Weigh Scales and Mixers(EU 004) - Control Equipment.** To control particulate matter at the Weigh Scales and Mixers, and the fugitive particulate matter generated in the Blending Building, the baghouse (EP 01) **shall be** in operation while the Blender(s) are in operation with or without Filler Operation.

[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 004) -Particulate Matter.** Estimated particulate matter emissions from the baghouse (EP 01), based on the vendor guarantee, is no more than 0.005 gr/acfm.

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

7. **Weigh Scales and Mixers (EU 004)-Visible Emissions.** The baghouse (EP 01) shall be operated such that visible emissions from this emission point shall not exceed 5 percent opacity.

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

TEST METHODS AND PROCEDURES

8. **Weigh Scales and Mixers (EU 004) - Particulate Matter.** The baghouse (EP 01) shall be assumed to be in compliance with the Particulate Matter emission estimate stated in **Specific Condition No. 6** if the emission point complies with the Visible Emissions limitations stated in **Specific Condition No. 7.**

9. The permittee shall also conduct a compliance test upon Department request in accordance with the requirements of **Section 4 Appendix D, Compliance Testing Requirements -Condition No. 4.b.** 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.]

10. **Weigh Scales and Mixers (EU 004) -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 the baghouse (EP 01) 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.]

11. **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.]

12. **Control Devices Operation and Maintenance Plan (EU 004).** The baghouse shall be inspected and maintained in accordance with the Operation and Maintenance Plan attached as Appendix A. 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 H_2O) 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.]

13. **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 $CaCO_3$, Additives, and Filler unloaded into Weigh Scales and Mixers
    (d) Hours of $CaCO_3$, Additives, and Filler unloading
    (e) Daily average of $CaCO_3$, Additives, and Filler unloading in pounds per hour

Specific Condition No. 13 continued:

(f) Number of Blenders in operation
(g) Filler Operation
(h) Baghouse in operation (EU 004)

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.]

14. **Reporting.** The permittee shall submit a report of the information required in **Specific Condition 13** with the Application for Non Title V Air Permit (Operation Permit application) required in **SECTION 2. Administrative Requirements No. 7.** The reporting period shall be for the calendar year prior to application submittal.

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