Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

PERMITTEE

Sanderson Pipe Corporation
One Enterprise West
P.O. Box 700
Sanderson, Florida 32087

Authorized Representative:
Mr. Steve Shumate, Plant Manager

Air Permit No. 0030008-015-AO
Air Operation Permit

Sanderson Pipe Corporation
Baker County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of Sanderson Pipe Corporation, which is a Polyvinyl Chloride (PVC) Pipe Manufacturing Facility (Standard Industrial Classification No. 3084). This project is to renew the operating permit. The facility is located in Baker County at One Enterprise West, East of State Road 229, in Sanderson, Florida. The UTM coordinates are Zone 17, 379.61 km East, and 3347.71 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed

action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

0030008-015-AO Effective Date: **July 30, 2018**
Renewal Application Due Date: **May 30, 2023**
Expiration Date: **July 30, 2023**

Executed in Jacksonville, Florida

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Brian Durden
Environmental Manager
Permitting Program

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent on the filing date below to the following listed persons:

Mr. Steve Shumate, Plant Manager, Sanderson Pipe Corporation, steve-s@sandersonpipe.com
Mr. James Lawrence, Safety/Environmental Coordinator, Sanderson Pipe Corporation, james-l@sandersonpipe.com
Ms. Leesa Gerald, President LG2 Environmental Solution, Inc., leesagerald@LG2ES.com

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Leslie Maybin July 30, 2018
Clerk Date

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 (EU001, EP01). 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 and 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 Model DFO 2-12 Cartridge Dust Collector by Donaldson Torit Dust Collector.

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.

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.

FOR INFORMATIONAL PURPOSES, POLLUTANT ESTIMATED EMISSIONS

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 existing facility consists of the following emissions units (EUs).

E.U. I.D. No.	E.pt. I.D. No.	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]
004	EP01	Weigh Scale and Mixers	Dust Collector [5]	1.41[5]
Facility-Wide Total Potential Particulate Matter Emissions				15.004

[1] Premier Pneumatics Bin Bag Filter, Model BVC-G-25-5S. Pulse-Jet cleaning, 25 bags, 250 ft^2 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 ft^2 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] Model DFO 2-12 Cartridge Dust Collector by Donaldson Torit Dust Collector. 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 **does not operate** 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 62-213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office. The Northeast District Office mailing address is 8800 Baymeadows Way, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance Section at: 8800 Baymeadows Way, Suite 100, Jacksonville, Florida 32256.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements) and Appendix E (O and M Plans).
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: 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. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]

EUs 001, 002, and 004

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	PVC Compound Mixture Operations. Emissions unit includes the PVC Resin Silo, eight PVC Compound Storage Silos, and the Day Bin Silo (EP01- EP10). 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.
004	Weigh Scale and Mixers with a Cartridge Dust Collector for particulate matter emission control at (EP01)

{These EUs are regulated under Rule 62-296.320(4), F.A.C.}

PERFORMANCE RESTRICTIONS

1. 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 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.

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

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).

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

3. PVC Compound Mixture Operations (EU001) – Control Equipment: The Bin Vent Filters at each of the silos (EP01 through EP10) shall be in operation at all times when 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.

   [Permit No. 0030008-011-AO]

4. PVC Regrind Operation (EU002) – Control Equipment: The baghouse shall be in operation at all times when 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.

   [Permit No. 0030008-011-AO]

5. Weigh Scales and Mixers (EU004) – Control Equipment: To control particulate matter at the Weigh Scales and Mixers, and the fugitive particulate matter generated in the Blending Building, the baghouse (EP01) shall be in operation while the Blender(s) are in operation with or without Filler Operation.

   [Permit No. 0030008-012-AC]

EMISSIONS STANDARDS

6. Weigh Scales and Mixers (EU004) -Particulate Matter: Estimated particulate matter emissions from the baghouse (EP01), based on the vendor guarantee, is no more than 0.005 gr/acfm.

   [Permit No. 0030008-012-AC]

7. Weigh Scales and Mixers (EU004)-Visible Emissions: The baghouse (EP01) shall be operated such that visible emissions from this emission point shall not exceed 5 percent opacity.

   [Permit No. 0030008-012-AC]

8. EU001 and 002 Visible Emissions: EUs 001 and 002 are not subject to a unit specific Visible Emissions standard.

   [Permit No. 0030008-009-AC]

TESTING REQUIREMENTS

9. Weigh Scales and Mixers (EU004) - Particulate Matter: The baghouse (EP01) shall be assumed to be in compliance with the Particulate Matter emission estimate stated in Specific Condition **No. 6.,** if (EP01) complies with the Visible Emissions limitations stated in Specific Condition **No. 7.**

   [Permit No. 0030008-012-AC]

10. Weigh Scales and Mixers (EU004) - Particulate Matter: 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. 8.c.** The test method shall be EPA Method 5 for PM, incorporated and adopted by reference in Chapter 62-297, F.A.C.

    [Rule 62-297.310(8)(c), F.A.C.; and Construction Permit No. 0030008-012-AC]

11. Annual Compliance Visible Emissions Tests Weigh Scales and Mixers (EU004): During each calendar year (January 1st to December 31st), EU004 shall be tested to demonstrate compliance with the emissions standards for VE at the baghouse (EP01). 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. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see Appendix D – Common

Continued:

Testing Requirements), in addition to the annual compliance tests, a test shall also be performed for VE prior to obtaining a renewed operation permit to demonstrate compliance with the emission limits in Specific Conditions **6. – 7**. [Rules 62-210.300(2)(a) and 62-297.310(8)(b)1, F.A.C.]

The above methods above are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

[Rule 62-297.310(8)(a)1, F.A.C.; and Construction Permit No. 0030008-012-AC]

12. EU001 and 002 Visible Emissions Compliance Testing: No visible emissions testing is required for these units, unless the Department request a Special Compliance test in accordance with the requirements of Section 4 Appendix D, Compliance Testing Requirements -Condition No. 8.c. The test method shall be EPA Method 9 for visible emissions, incorporated and adopted by reference in Chapter 62-297, F.A.C.

    [Rule 62-297.310(8)(c), F.A.C.; and Construction Permit No. 0030008-009-AC]

13. 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(5)(b), F.A.C.]

14. 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. For each test run, the report shall also indicate the {nominal production rate of PVC Compound Mix; nominal throughput rate at the PVC Regrind Operation; nominal unloading rate of $CaCO_3$ and Additives (Filler Operation)}.
    [Rule 62-297.310(10), F.A.C.]

OPERATION AND MAINTENANCE PLAN

15. Control Devices Operation and Maintenance Plan (EUs 001 - 004). The baghouse shall be inspected and maintained in accordance with the Operation and Maintenance Plan attached as Appendix E. 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 62-4.160(7), F.A.C., Rule 62-4.160(14)(b), F.A.C.; and Permit No. 0030008-012-AC]

REPORTING AND RECORDKEEPING REQUIREMENTS

16. Operations and Processing Rate Records: In order to demonstrate compliance with the requirements 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 $CaCO_3$ (Filler), and Additives unloaded into Weigh Scales and Mixers.
    (d) Hours of $CaCO_3$ (Filler), Additives unloading.
    (e) Daily average of $CaCO_3$ (Filler), Additives unloading in pounds per hour.
    (f) Number of Blenders in operation.
    (g) Daily indication if the baghouse was in operation for (EUs 001 - 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 62-4.160(7)(a), F.A.C.; Rule 62-4.160(14)(b), F.A.C.; Permit Nos. 0030008-009-AC; and 0030008-012-AC]

17. Reporting: The permittee shall submit a report of the information required in Specific Condition **No. 16.**, and the O and M Plans, with the Application for Non-Title V Air Permit Renewal (Operation Permit application). The reporting period shall be for the calendar year prior to application submittal.

    [Permit No. 0030008-012-AC]