

Advanced Elastomer Systems, L.P.  
Cantonment facility  
Facility ID No.: 0330133  
Escambia County

Air Operation Permit  
Permit No.: 0330133-004-AO

Permitting and Compliance Authority  
Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, FL 32501-5794  
Telephone: 850/595-8364  
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[electronic file name: 0330133-004-ao.doc; July 10 draft]

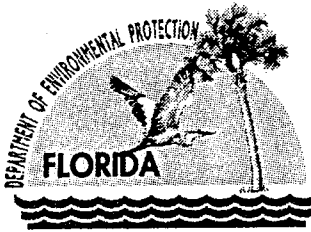
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Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

David B. Struhs  
Secretary

Permittee:  
Advanced Elastomer Systems, L.P.

Permit No.: 0330133-004-AO  
Facility ID No.: 0330133  
SIC Nos.: 2821  
Project: Air Operation Permit

This permit is for the operation of the Cantonment facility located at 604 Chemstrand Road in Cantonment, Escambia County; UTM Coordinates: Zone 16, 476.5 km East and 3384.6 km North; Latitude: 30° 35' 44" North and Longitude: 87° 14' 42" West.

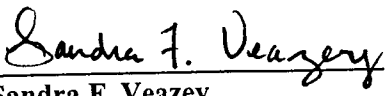
STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix G-1, General Conditions

Effective Date: July 18, 2001  
Renewal Application Due Date: May 20, 2006  
Expiration Date: July 18, 2006

**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

  
Sandra F. Veazey  
Air Program Administrator

SFV/rvk

## **Section I. Facility Information.**

### **Subsection A. Facility Description.**

This facility produces thermoplastic elastomers using five production lines. Inorganic filler, rubber bale, and rubber compounding additives are pulverized and blended. Plastic resins, oil, and additives and added, pellets are extruded and then dried and packaged.

Emissions include particulate matter and volatile organic compounds, primarily formaldehyde. Emissions are controlled by dust collectors, a scrubber, or are uncontrolled.

Construction permit AC17-259666 was issued November 28, 1994. This permit limited VE emissions to 5% opacity, limited the maximum operating rate for the five lines combined to 27,000 pounds of thermoplastic rubber per hour, and imposed specific PM emission limits.

Based on the permit application received June 14, 2001, this facility is not a major source of hazardous air pollutants (HAPs).

### **Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

#### **E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
007	Emission points controlled by baghouses or filters
008	Emission points controlled by a scrubber
009	Uncontrolled emission points

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.*

### **Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

Permit Application received June 14, 2001

Additional Information Letters dated June 26 and July 6, 2001

## Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units 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 discharged 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 the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. (only if applicable) Prevention of Accidental Releases (Section 112(r) of CAA).
  - a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
  - b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
  - c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.
5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) 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 controls including covering all vats, containers, etc., that are used for temporary and permanent storage of VOCs and/or organic solvents. All equipment, pipes, hoses, lids, fitting, etc shall be operated and maintained in such a manner to minimize leaks, fugitive emissions, and spills of VOC materials.  
[Rule 62-296.320(1)(a), F.A.C.]

6. Potential to emit.

The maximum allowable emissions are limited as follows:

<u>Pollutant</u>	<u>Allowable Emissions</u>
PM	4.3 tons/year facility wide (rolling twelve month average)
VOC	2.3 tons/year facility wide (rolling twelve month average)

The maximum allowable operating rate is limited to 27,000 pound of raw material process input per hour. Compliance shall be demonstrated in accordance with condition 7, Record Keeping. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Construction permit AC17-259666 issued November 28, 1994; Renewal operating permit application]

7. Record Keeping. Records shall be maintained and made available for Department inspection identifying the average monthly and rolling twelve-month average emissions of PM, VOCs, HAPs, and formaldehyde based on emission factors and calculations using TPE raw materials process input, and the average monthly and rolling twelve month average of raw material process input. .  
[Rule 62-4.070, F.A.C.]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]

9. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department.  
[Rule 62-4.090, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, Florida 32501-5794  
Telephone: 850/595-8364, press 7; Fax: 850/595-8096

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364, then press 7, during normal working hours.  
[Rules 62-210.700 and 62-4.130, F.A.C.]

### Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

#### E.U. ID

<u>No.</u>	<u>Brief Description</u>
007	Emission points controlled by baghouses or filters

This emission unit includes bag filters and dust collectors for filler transfer systems, material preparation blenders, and line operation. Potential emissions associated with these points are 3.89 tons/year particulate matter.

This emission unit includes:

<u>ID</u>	<u>Description</u>	<u>PM Emissions (TPY)</u>	<u>VOC Emissions (TPY)</u>
A1	Bag filter, filler transfer system for lines 1 & 2	0.61	
A3	Bag filter, filler transfer system for lines 3 & 5	0.61	
B1	Preparation Blender Dust collector For lines 1 & 2	0.66	
B3	Preparation Blender Dust collector For lines 3& 5	0.66	
B4	Dust collector for line 4	0.74	
J	Compounded rubber filter for Lines 1 & 2	0.61	
Total emissions		3.89 TPY PM	

Construction permit AC17-259666 was issued November 28, 1994. This permit limited VE emissions to 5% opacity, and imposed specific PM emission limits.

The following specific conditions apply to the emissions unit(s) listed above:

#### Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### Emission Limitations and Standards

A.2. Visible Emissions. Visible emissions shall be limited to 5% opacity.  
[Construction permit AC17-259666 issued November 28, 1994].

**Test Methods and Procedures**

**A.3. a.** Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for thirty minutes. Such tests shall be scheduled between February 1 and March 31, 2006. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

**A.3.b.** The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

**A.3.c.** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-297.310(2) and 62-4.070, F.A.C.]



### **Section III. Emissions Unit(s) and Conditions.**

**Subsection B. This section addresses the following emissions unit(s).**

#### **E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
008	Emission points controlled by scrubber

This emission unit includes an extruder gas scrubber for lines 1 and 5. Potential emissions are limited to 0.44 TPY PM and 0.013 TPY VOCs.

Construction permit AC17-259666 was issued November 28, 1994. This permit limited VE emissions to 5% opacity, and imposed specific PM emission limits.

**The following specific conditions apply to the emissions unit(s) listed above:**

#### **Essential Potential to Emit (PTE) Parameters**

**B.1. Hours of Operation.** This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### **Emission Limitations and Standards**

**B.2. Visible Emissions.** Visible emissions shall be limited to 5% opacity.  
[Construction permit AC17-259666 issued November 28, 1994].

#### **Test Methods and Procedures**

**B.3. a.** Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for thirty minutes. Such tests shall be scheduled between February 1 and March 31, 2006. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.  
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

**B.3.b.** The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.  
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

**B.3.c.** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% 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 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.  
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

### Section III. Emissions Unit(s) and Conditions.

Subsection C. This section addresses the following emissions unit(s).

#### E.U. ID

<u>No.</u>	<u>Brief Description</u>
009	Uncontrolled emission points

This emission unit includes various uncontrolled sources of VOC emissions. Potential emissions associated with these points are 2.283 tons/year VOCs.

This emission unit includes:

<u>ID</u>	<u>Description</u>	<u>PM Emissions (TPY)</u>	<u>VOC Emissions (TPY)</u>
C	Pellet Dryer Discharge for Lines 1 – 5		2.191
D1	Pellet transfer vent for line 1		0.022
E1-5	Storage bin vents for Lines 1 – 5		0.0648
G	Pellet packaging vent for Lines 1 – 5		0.0026
H	Pellet transfer blowers for Lines 1 – 5		0.0026
		Total:	2.283 TPY VOC

Construction permit AC17-259666 was issued November 28, 1994. This permit limited VE emissions to 5% opacity, and imposed specific PM emission limits.

The following specific conditions apply to the emissions unit(s) listed above:

#### Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### Emission Limitations and Standards

C.2. Visible Emissions. Visible emissions shall be limited to 5% opacity.  
[Construction permit AC17-259666 issued November 28, 1994].

#### Test Methods and Procedures

C.3. a. Visible Emissions tests are required to show compliance with the standards of the Department on each emission point (C, D1, G, and H) and one representative vent for E1-5). The test results must provide reasonable assurance that the source is capable of compliance at the

permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for thirty minutes. Such tests shall be scheduled between February 1 and March 31, 2006. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.  
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

**C.3.b.** The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.  
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

**C.3.c.** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.  
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

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**Appendix G-1**

**GENERAL CONDITIONS:**

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1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 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 these 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. Nor 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 does not constitute 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 no 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 not 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 permittee 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, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
  - a. Having access to and copying any records that must be kept under the conditions of this permit;
  - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit;and,
  - c. Sampling or monitoring 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.
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 noncompliance; and
  - b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent

**Permit No.: 0330133-004-AO**

**Appendix G-1**

**GENERAL CONDITIONS:**

**Page 2 of 2**

recurrence of the noncompliance. 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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. 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 measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 the 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.