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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Wayne Pegram
Plant Manager
Atkore Plastics Pipe Co.
5128 West Hanna Avenue
Tampa, FL 33634

File No.: 05700340-011-AO
County: Hillsborough

_____/

Enclosed is Permit Number 0570340-011-AO to operate a PVC pipe manufacturing facility at the Tampa plant located at 5128 West Hanna Avenue, Tampa, FL 33634, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit.

Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice.

A petitioner shall 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 of the F.A.C.

A petition that disputes the material facts on which the EPC'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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC 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, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC'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 EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting

materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/SN/sn

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on 11/14/14 to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

Patricia S. Fons 11/14/14

Clerk Date

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PERMITTEE:
Atkore Plastics Pipe Co.
5128 West Hanna Avenue
Tampa, FL 33634

PERMIT/CERTIFICATION
Permit No.: 0570340-011-AO
County: Hillsborough
Expiration Date: November 14, 2019
Project: PVC Pipe Manufacturing Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 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 EPC and made a part of hereof and specifically described as follows:

This permit authorizes the operation of a PVC pipe manufacturing facility. The PVC resin is received by railcar and then pneumatically unloaded into two PVC resin receiving hoppers. The two PVC resin receiving hoppers are controlled by two dust collectors which vent inside the building. The PVC resin is gravity fed from the receiving hoppers into two weigh hoppers and then gravity fed into two mixing blenders, where the PVC resin is mixed with a pre-determined quantity of various powdered raw materials including limestone. The bagged limestone is manually introduced into two dry chemical hoppers that feed into the two heated mixing blenders. The heat from the two heated blenders is created by the friction of the blades against the resin which achieves a temperature of 200 -210 ºF. The emissions from the two heated mixing blender and two water jacketed cooling blenders are controlled by filter socks, which vent inside the building. The blended mixture is then cooled by two water jacketed cooling blenders.

The PVC blended material is then pneumatically loaded into one of the five storage silos (Silos 1 thru 5). The emissions from the PVC resin silo loadings are controlled by dust collectors, which operate in a passive mode, as they do not have a fan. All the PVC pipe production and batching operation occur inside of an enclosed production building at the extrusion lines. The beginning of the PVC pipe manufacturing starts with the blended resin mixture being transferred pneumatically from the five (5) storage silos into the receiving vessels (hoppers) located at each pipe extrusion line. The resin is mechanically conveyed from the hoppers into the pipe extrusion line where it is extruded and formed into PVC pipes of various sizes and colors. The pipe extrusion line consist of the following pieces of equipment in series: a lower hopper, then the mixer hopper, extruder barrel, die, vacuum chamber, water cooling, printer that labels pipe, pipe puller, the saw that cuts the pipe to length and then a beller that forms the bell on the pipe by warming the pipe using electric heat. Once belled, the pipes are stacked for shipment.

SPECIFIC CONDITIONS:

Particulate matter (PM) emissions from this operation are generated from the two PVC resin receiving hoppers, dry chemical weigh hopper, two weigh hoppers for PVC, two PVC heated blenders, two cooler blenders, PVC grinder and the five (5) PVC resin storage silos. The emissions from the two PVC resin receiving hoppers and the two dry chemical weigh hoppers are controlled by a baghouse that vents indoors. The two PVC heated blenders and the two cooler blenders are controlled by a filter sock that vents indoors, and the PVC grinder is controlled by a cyclone followed by a filter sock and vented into the building. Also, there are PM emissions associated with the pipe cutting operation at the end of the pipe extrusion lines, which is performed inside the building. Altogether, these emission sources are exempt from permitting pursuant to Rule 62-210.300(3)(b)1. F.A.C. Each storage silo has its own baghouse to control PM emissions.

Also, VOC emissions are emitted from the pipe letter printing operation, which uses ink and solvent. Pursuant to Rule 62-210.300(3)(a)36., F.A.C., the printing operation is exempt from permitting. However, because this operation is part of the overall PVC manufacturing process, the permittee will be required to keep records on ink and solvent usages in order to provide reasonable assurance that they maintain their exemption status. In addition, vinyl chloride emissions are emitted from the extrusion lines. Vinyl chloride monomer and hydrogen chloride emissions from the extrusion process have also been determined to be negligible.

The information for the silos with associated baghouses are as follow:

Silo No.	EU No.	Baghouse Description
Silo No. 1	EU 013	980 ACFM Griffin Environmental Company, Model No. JV-36-4X Jet Vent
Silo No. 2	EU 014	980 ACFM Griffin Environmental Company, Model No. JV-36-4X Jet Vent
Silo No. 3	EU 015	980 ACFM Griffin Environmental Company, Model No. JV-36-4X Jet Vent
Silo No. 4	EU 016	980 ACFM Griffin Environmental Company, Model No. JV-36-4X Jet Vent
Silo No. 5	EU 017	980 ACFM Griffin Environmental Company, Model No. JV-36-4X Jet Vent

Location: 5128 West Hanna Avenue, Tampa, FL

UTM: 17-249.0 E 3097.1 N

NEDS NO: 0340

PERMITTEE:
Atkore Plastics Pipe Co.

PERMIT/CERTIFICATION NO.: 0570340-011-AO
PROJECT: PVC Pipe Manufacturing Plant

SPECIFIC CONDITIONS:

EU ID: 013 – Silo No. 1
014 – Silo No. 2
015 – Silo No. 3
016 – Silo No. 4
017 – Silo No. 5

Replaces Permit No.: 0570340-010-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

5. Visible emissions shall not exceed 5% opacity. [Rules 62-296.320 and 62-297.620(4), F.A.C. and Chapter 1-3.52 of the Rules of the Environmental Protection Commission of Hillsborough County]

6. In order to limit the potential to emit and maintain the facility as a synthetic minor source of PM emissions, the emissions from the silo shall not exceed 0.03 gr/dscf and the facility shall not exceed 5.4 TPY of PM emissions. [Rule 62-4.070(3), F.A.C.]

7. In order to ensure compliance with Specific Condition No. 5 the following limitations and restrictions shall apply: [Rule 62-4.070(3), F.A.C.]

A) Maximum loading rate for each PVC resin storage silo (Silo No. 1 thru 5): 4,200 lb/hr;
B) Maximum PVC pipes production rate shall not exceed: 73,584,000 lb/yr
C) The hours of operation are not restricted;
D) All dust laden air from the silo loadings shall be directed to one of the baghouses listed on Page 2 of this permit.

8. The permittee shall properly operate and maintain the baghouses that control the emissions from the storage silos. [Rule 62-4.070(3), F.A.C.]

A) A written bag replacement schedule and record for each silo baghouse. Bag replacement shall be no less than the frequency prescribed by the baghouse or bag manufacturer or when required to ensure proper performance of the baghouse.
B) A written weekly operational check shall be conducted on the silo baghouses while the baghouses are being loaded. If a particular baghouses is not loaded on any particular week the operational check does not have to be conducted. This shall include, but is not limited, to checking for proper operation (i.e., visual observation of the baghouse), air pressure of the pulse jet cleaning cycle, and proper differential pressure across each silo baghouse.

SPECIFIC CONDITIONS:

9. Test the five (5) storage silos for visible emissions during each federal fiscal year (October 1 – September 30) with a target date of July 16, 2014 and submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County. If all the sources required to be tested are not on site then any source not tested shall be tested within 30 days of being brought on site. [Rule 62-297.310, F.A.C.]

10. Compliance with the emission limitation of Specific Condition No. 5 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

11. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of maximum loading rate of 4,200 lb/hr loading rate for each of the five (5) PVC resin storage silos (Silo Nos. 1 thru 5). If it is impracticable to test at capacity, then the source 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 EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. The latest compliance test was performed on July 16, 2014 at a process rate of 3,480 lbs/hr. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

12. In order to demonstrate compliance with Specific Condition Nos. 5 and 6, the permittee shall maintain a monthly recordkeeping system. The records shall be maintained onsite for three years and shall be made available to any local, state, or federal air pollution agency. The records shall include, but not limited to, the following: [Rule 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

A) Month/Year
B) Production rate of the pipes (lb/month);
C) Ink and solvent usages (gal/month);
D) Rolling twelve month totals of B) and C) above.

13. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

14. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and

SPECIFIC CONDITIONS:

handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320(4)(c)3., F.A.C.]

A) Removal of dust from the floors of the manufacturing area (including the blending areas) as needed.
B) Removal of dust from other factory grounds as needed.

15. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

16. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(205), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.

17. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

18. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the 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 EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

PERMITTEE:
Atkore Plastics Pipe Co.

PERMIT/CERTIFICATION NO.: 0570340-011-AO
PROJECT: PVC Pipe Manufacturing Plant

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

ATTACHMENT - 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 403.141, 403.727, or 403.859 through 403.861, F.S. 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 403.987(6) and 403.722(5), F.S., 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 this permit.

(4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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, 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 reasonable times, access to the premises where the permitted activity is located or conducted to:

(a) Have access to and copy any records that must be kept under 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.

(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 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 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 prescribed by Sections 403.111 and 403.73, F.S. 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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department approval in accordance with 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

(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:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. 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 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.