



Florida Department of Environmental Protection

South District Office
P.O. Box 2549
Ft. Myers, Florida 33902-2549

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 1, 2009

FILE

CERTIFIED MAIL 7008 0150 0003 1458 9197
RETURN RECEIPT REQUESTED

Mr. James Gorsuch, CFO
E-Stone USA Corporation
420 Haywood Taylor Blvd.
Sebring, Florida 32082

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0550049-004-AV
E-Stone, Highlands County

Dear Mr. Gorsuch:

The Department received your initial Title V permit application for the E-Stone facility on February 3, 2009. The application is incomplete. In order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Fuel Usage

1. Please specify if it is the applicant's intent to not use propane gas in any of the emission units at the facility. If it is the intent of the facility to not use propane gas, please verify that the propane storage tanks are indeed insignificant emission units and submit a revised insignificant list, if necessary. If it is not the intent of the facility to eliminate propane gas, please complete the respective application segment information for propane gas for all emission units that will use propane gas.

Emissions Units and Activities

2. Please specify what specific preventions the facility takes to prevent unconfined particulate matter (PM).

Compliance Plan

3. The Department understands that polymerizing line 2 is substantially complete and that this unit has not been placed into operation. The Department also understands that this unit is now going to require a separate regenerative thermal oxidizer (RTO) to control organic HAP emissions. As such, polymerizing line 2 needs to be incorporated into the initial Title V permit with a compliance plan per Rule 62-213.440(2), F.A.C. Please submit a compliance plan for polymerizing line 2. The compliance shall include milestones for completion of polymerizing line 2, submittal of a construction application for the RTO, installation and completion of a RTO, and initial compliance demonstration. Please note that the operation of polymerizing line 2 will not be authorized to be operated until the compliance plan has been completed.

Mr. James Gorsuch
DEP File No. 0550049-004-AV
E-Stone
April 1, 2009

Compliance Demonstration Test Report

4. It appears that the Compliance Demonstration Testing Report may have some inaccuracies regarding the testing data. Please respond to the South District's Air Resource Management Compliance and Enforcement Section's letter dated March 27, 2009 pertaining to these possible inaccuracies and submit a copy of your response to that letter with this letter. A copy of this letter is attached for your convenience.

The application and supplemental information stated that the facility has a limit of 99 TPY of HAP. Please note, as previously communicated, this facility is not limited to 99 TPY of organic HAP by its permit. The facility may self impose its own limitation of 99 TPY of organic HAP, however, the Department has permitted the organic HAP emissions in accordance with the regulations of 40 CFR 60 Subpart WWWW. Subpart WWWW requires monthly calculations of organic HAP emissions before and after controls in order to determine compliance demonstration. If the organic HAP emissions before controls is less than 100 TPY, the facility is subject to the lbs. HAP per ton resin used limit specified in Table 3 of Subpart WWWW. If the organic HAP before controls TPY HAP is over 100 TPY, the facility may be subject to a 95% reduction of total organic HAP at the facility. Please refer to 40 CR 63.5799, 63.5805, and 63.5810.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item number(s) 1., 3., and 4. above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item number(s) 1., 2., 3., and 4. above should be certified by a professional engineer registered in the State of Florida.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you should have any questions, please call Susan Machinski at 239/332-6975, Ext. 109.

Sincerely,



Ajaya K. Satyal
District Air Program Administrator

AKS/SRM/jw

Enclosure

Copies to:

James Show, P.E., Grove Scientific and Engineering Company – j_sshow@bellsouth.net
Bruno Ferraro, Grove Scientific and Engineering Company – [Bruno@grovescientific.com](mailto: Bruno@grovescientific.com)

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com
OFFICIAL USE

7008 0150 0003 1458 9197

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage		

Sent To: **MR JAMES GORSUCH CFO**
E-STONE USA CORPORATION
420 HAYWOOD TAYLOR BLVD
SEBRING FL 32082

PS Form 3800

SENDER COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
 - Print your name and address on the reverse so that we can return the card to you.
 - Attach this card to the back of the mailpiece, or on the front if space permits.
1. Article Addressed to:
- MR JAMES GORSUCH CFO**
E-STONE USA CORPORATION
420 HAYWOOD TAYLOR BLVD
SEBRING FL 32082

COMPLETE THIS SECTION IN DELIVERY

A. Signature Agent Addressee

B. Received by (Printed Name) **J. Gorsuch** C. Date of Delivery **4/3/09**

D. Is delivery address different from item 1? Yes No
 if YES, enter delivery address below:

RECEIVED - D.E.P.
APR 06 2009
SOUTH DISTRICT

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. 7008 0150 0003 1458 9197 SRM/jw