

# INTEROFFICE MEMORANDUM

(Draft)

**Date:** 17-Apr-2000 11:27am

**From:** Tom Cascio TAL

**Dept:**

**Tel No:**

**To:** Owen Mancarella PEN (MANCARELLA\_O @ A1 @ DEPPNS)

**Subject:** WESTLAKE PVC CORPORATION

Owen:

This pre-draft looks fine. Good thorough description, etc. Just need to spell check.

Tom

# Electronic Notification Cover Memorandum

**TO:** Barbara Boutwell, Title V Section, Tallahassee  
**THRU:** Ed Middleswart, Administrator, Northwest District Air Program  
**FROM:** Owen Mancarella, Permit Engineer  
**DATE:** April 7, 2000  
**RE:** DRAFT Title V Permit(s) for Tallahassee Review

Review By:  
4 | 17 | 00

The following Title V permit(s) and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Westlake PVC Corp.	Santa Rosa	electronic	darm_common\t5permit\nwd\1130035\predraft

This zipped file contains the following electronic files:

- 1130035i.doc
- 1130035d.doc
- 11300351.xls
- 11300352.xls
- 1130035h.doc
- 1130035s.doc
- 1130035sob.doc

Looks OK

Refer to Spec attached  
Good description

## FLORIDA'S Permit Application Summary Form

### General Facility Information

Facility name: Westlake PVC Corporation    AIRS ID: 1130035  
 Facility address: 4385 Hwy 90                 Date application received: June 14, 1996  
                                  Pace, FL 32571-2064             Permit number: 1130035-001-AV  
 SIC code of major product: 2821                County located: Santa Rosa

### Application Type/Permit Activity

Initial issuance                                          General permit  
 Permit modification                                          Conditional major  
 Permit renewal

### Facility Emissions Summary Table

Pollutant	Allowable (tpy)
PM	79.34
SO <sub>2</sub>	0
NO <sub>x</sub>	0
CO	0
VOC	0
LEAD	0
HAP ≥ 10 tpy (by CAS)	59.0

### Compliance Summary

Source is out of compliance                                          Compliance schedule included  
 Compliance certification signed

### Applicable Requirements list

PSD                      NESHAPS                      Other  
 NSPS                      SIP

### Miscellaneous

Acid rain source  
 Facility subject to 112(r)  
 Facility applied for federally enforceable emissions cap  
 Facility provided terms for alternative operating scenarios  
 One or more emissions unit(s) subject to a MACT standard  
 One or more emissions unit(s) requested case-by-case 112(g) or (j) determination  
 Application proposes new control technology  
 Certified by responsible official  
 Diagrams or drawings included  
 Confidential business information (CBI) was received

## STATEMENT OF BASIS

Westlake PVC Corporation  
Pace Plant  
**Facility ID No.:** 1130035  
Santa Rosa County

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 1130035-001-AV

This Title V 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, 62-210, and 62-213. 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.

Westlake PVC Inc. is a producer of Polyvinyl Chloride (PVC) powder. This facility has been idle since 1998 and at the present time is still idle. Operations at this facility are classified Standard Industrial Classification Code 2821 (plastic materials, synthetic resins, and non-vulcanizable elastomers). The facility was originally constructed in 1957. Westlake PVC Corporation purchased the facility in 1991. This facility is a batch processor and uses a suspension polymerization method. Vinyl Chloride Monomer (VCM) is delivered to the site via railroad cars. The VCM is pumped into storage tanks. From the storage tanks, VCM is polymerized in either the North Line or South Line Reactors. The VCM is suspended [suspension agent (alcohol)] in a reactor. Water is used as a solvent. Catalysts (peroxides) are added to the reactor and an exothermic polymerization reaction takes place. The blend slurry is removed from the reactor and separated (stripped) into reacted polymer and unreacted monomer using continuous heated stripping columns. Recovered VCM is compressed and condensed by refrigeration and reprocessed. Non-compressible gasses (NCGs) from the recovery process are sent to a thermal oxidizer to control final emissions.

Wastewater containing VCM is stripped of VCM before being discharged to the wastewater treatment system. The polymerized slurry (PVC) is dewatered by centrifuges and dried in rotary dryers or a fluid bed dryer. Particulate emissions from the dryers are controlled by cyclones. Particulate emissions from hold bins and silos are controlled by filters. PVC lost from the main process stream by spillage, specification deficiency, or collected by filters is bagged and declared "off spec". Properly processed PVC is pneumatically conveyed into ground silos, bags, or railroad cars and shipped to customers. The annual PVC production capacity for this facility is 400,000,000 pounds.

In accordance with Rule 62-210.200(148)(a), F.A.C. vinyl chloride is a hazardous air pollutant (HAP). Rule 62-210.200(243)(c), F.A.C. states that vinyl chloride is a regulated air pollutant. In addition, Rule 62-204.800 F.A.C., 40 CFR Part 61, Subpart F-- National Emission Standard for Vinyl Chloride, is defined as the applicable regulation for plants which produce one or more polymers containing any fraction of polymerized vinyl chloride.

The Title V application declares that the plant has a self-imposed emissions cap of 55 TPY of vinyl chloride. In accordance with 62-213.420(3)(c) 1.c. F.A.C., the major source threshold (the facility emits or has the potential to emit) for any HAP is 10 TPY. Because the facility has the potential to emit greater than 10 TPY of vinyl chloride, a HAP, it is a major source of air pollution and is subject to Title V of the Act. The facility also has a self-imposed emissions cap of 79.34 TPY of particulate matter (PM).

Thermal Oxidizer (Emission Unit 019) [40CFR61.65]

Gases from the reactors, blowdown tanks, column feed tanks, and VCM stripping columns are directed to the VCM recovery system. Water that has been exposed to VCM is processed through a wastewater stripper. VCM from the wastewater stripper is also directed to the VCM recovery system. All of these gases are compressed and condensed in the VCM recovery system. VCM that is recovered is reintroduced into the polymerization process. Gases that cannot be compressed and condensed are sent to the thermal oxidizer. This natural gas fired unit burns all waste gases, primarily non-compressible gasses (NCGs), from the VCM polymerization process. The thermal oxidizer has a Bendix Model 700 wet scrubber to control emissions. An ambient air monitoring system is installed to continuously monitor the exhaust stack of the wet scrubber. This is a regulated emission unit.

Handling and Storage, Bins & Silos (Emission Unit 022) [40CFR61.64]

Based on the particle size, purity, and quality, PVC is moved through different plant process flows. Emission controls through handling and storage are primarily concerned with controlling PM. This is a regulated emission unit. The handling and storage flow includes:

**Sweco Filters:** PVC slurry is pumped from the stripping columns to the Sweco Filters. Here the PVC slurry is processed through a wet screen. Venting is direct to the atmosphere.

**Blend Tanks:** After the PVC slurry has been screened it is pumped into the blend tanks. From the blend tanks, the wet PVC is pumped to the dryers. Venting is direct to the atmosphere.

**Holding Bins:** Dry PVC is discharged from the dryers into the holding bins. Displaced air in the holding bins is discharged through four openings. PM emissions are controlled by filter socks and the Alpine Baghouse.

**Railcar Suction Blower:** This blower is used to remove residual PVC left in the bottom of railcars. A suction hose is connected to the blower and used to transfer the PVC resin to the blower. From the blower, the PVC can be transferred to the ground silos.

**Ground Silos:** Eight silos can receive the PVC from the dryers and bulk handling system. Each ground silo uses a baghouse to control PM emissions.

**Inside Loading:** PVC resin from the ground silos, holding bins, and railcar cleanout is pneumatically moved into railcars. The transport air released into the railcar is sucked through the bag filter hoppers. Filtered PVC is fed back to the railcar. Emissions are controlled by a baghouse.

**Over Track Silos:** Eight silos receive PVC from the dryers and/or ground silos. From the over track silos the PVC is loaded into railcars. The silos are vented to each other and the empty

space above the PVC acts as a settling chamber. Seven of the silos vent back through their inlets that are manifolded into a baghouse. The eighth silo is plumbed separately from the other seven silos to allow it to process a different grade of PVC. Emissions from this silo are controlled by a different baghouse.

Reactor Opening Losses (Emission Unit 024) [40CFR61.64]

The polymerization of the VCM takes place in the reactor vessels. While the reactor vessels are being used to process VCM, they are not vented to the atmosphere. After an appropriate number of batches have been reacted and/or reactor maintenance is needed, reactors are taken out of service. Prior to opening, steam stripping is used to reduce the concentration of VCM in reactors. Upon achieving an appropriate VCM concentration, the reactors are opened to the atmosphere. All the VCM remaining in opened reactors vent directly to the atmosphere through the opening. This is a regulated emission unit.

North and South Rotary Dryers & Niro Dryer (Emission Unit 025) [40CFR61.64]

The PVC slurry processed from either the North Line or South Line Reactors is piped into the their corresponding blend tanks. From the blend tanks, the PVC slurry can be processed through both the North and South Rotary Dryers or the Niro Dryer.

Niro Dryer: The PVC slurry is first centrifuged to remove excess water. This water is sent to the wastewater treatment system. The PVC wet cake that comes from the centrifuge is then fed into the fluid bed dryer. As the PVC wet cake dries, it moves through the first and second stage of the Niro Dryer. A cyclone for each stage controls emissions. Both cyclones are vented through the same stack.

North and South Rotary Dryers: The PVC slurry is first centrifuged to remove excess water. This water is sent to the wastewater treatment system. The PVC wet cake that comes from the centrifuge is then fed into the dryers where heated air is used to dry the PVC. Both the North and South Dryers' hot air discharge is vented through a pair of parallel cyclones with a common vent. This is a regulated emission unit.

Doug Niewoehner  
Plant Manager  
Westlake PVC Corporation  
P O Box 140  
Pensacola FL 32591-0140

Re: DRAFT Title V Permit No.: 1130035-002-AV  
Pace Plant

Dear Mr. Niewoehner:

One copy of the DRAFT Title V Air Operation Permit for the Pace Plant located at 4385 Highway 90 in Pace, Santa Rosa County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Ed K. Middleswart, P.E., at the above letterhead address. If you have any other questions, please contact Andy Allen at 850/595-8364, extension 1223.

Sincerely,

ED K. MIDDLESWART, P.E.  
Air Program Administrator

EKM/trc

Enclosures

[electronic file name: 1130035i.doc]

In the Matter of an  
Application for Permit by:

Westlake PVC Corporation  
P O Box 140  
Pensacola FL 32591-0140

DRAFT Permit No.: 1130035-002-AV  
Pace Plant  
Santa Rosa County

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**INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Westlake PVC Corporation, applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Pace Plant located at 4385 Highway 90 in Pace, Santa Rosa County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Northwest District, 160 Governmental Center, Pensacola, FL 32501-5794 (Telephone: 850/595-8364; Fax: 850/595-8417), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.



The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT.” Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting 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 Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3900 (Telephone: 850/488-9735; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 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 fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 12-60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. 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, F.A.C.

A petition that disputes the material facts on which the permitting authority’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 permitting authority's final action may be different from the position taken by it in this notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty days of the expiration of the Administrator's forty-five day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M Street, S.W., Washington, D.C. 20460.

Executed in Pensacola, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

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ED K. MIDDLESWART, P.E.  
Air Program Administrator

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

Mr. Doug Niewoehner, Westlake PVC Corporation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail or electronically transmitted on the same date to the person(s) listed:

Ms. Gracy Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Scott Sheplak, P.E., Bureau of Air Regulation

**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.

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(Clerk)

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(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION NORTHWEST DISTRICT

Title V DRAFT Permit No.: 1130035-002-AV

Pace Plant

Santa Rosa County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Westlake PVC Corporation for the Pace Plant located at 4385 Highway 90 in Pace, Santa Rosa County. The applicant's name and address are: Westlake PVC Corporation, P O Box 140, Pensacola FL 32591-0140.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of thirty days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office, Northwest District, 160 Governmental Center, Pensacola, FL 32501-5794 (Telephone: 850/595-8364; Fax: 850/595-8096). Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3900 (Telephone: 850/488-9735; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. 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 applicable 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 Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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 demand for relief.

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 permitting authority's final action may be different from the position taken by it in this notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty days of the expiration of the Administrator's forty-five day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

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

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Ed K. Middleswart, P.E., at the above address, or call 850/595-8364 x 1220, for additional information.

Westlake PVC Corporation  
Pace Plant  
**Facility ID No.:** 1130035  
Santa Rosa County

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 1130035-001-AV

Permitting and Compliance Authority:  
Department of Environmental Protection  
Northwest District  
160 Governmental Center  
Pensacola, FL 32501-5794  
Telephone: 850/595-8364  
Fax: 850/595-8096

Drafted on April 7, 2000

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 1130035-001-AV

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**Permittee:**  
Westlake PVC Corporation

**DRAFT Permit No.:** 1130035-001-AV  
**Facility ID No.:** 1130035  
**SIC Nos.:** 2821  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the Pace Plant located at 4385 Highway 90 in Pace, Santa Rosa County; UTM Coordinates: Zone 16, 495.25 km East and 3381.40 km North; Latitude: 30° 34' 00" North and Longitude: 87° 03' 00" West.

STATEMENT OF BASIS: This Title V 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, 62-210, and 62-213. 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 TV-3, Title V Conditions

**Effective Date:**  
**Renewal Application Due Date:**  
**Expiration Date:**

**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

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**Ed K. Middleswart, P.E.**  
**Air Program Administrator**

EKM/tr



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

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



Westlake PVC Inc. is a producer of Polyvinyl Chloride (PVC) powder. This facility has been idle since 1998 and at the present time is still idle. Operations at this facility are classified Standard Industrial Classification (SIC) Code 2821 (plastic materials, synthetic resins, and non-vulcanizable elastomers). The facility was originally constructed in 1957. Westlake PVC Corporation purchased the facility in 1991. This facility is a batch processor and uses a suspension polymerization method. Vinyl Chloride Monomer (VCM) is delivered to the site via railroad cars. The VCM is pumped into storage tanks. From the storage tanks, VCM is polymerized in either the North Line or South Line Reactors. The VCM is suspended (suspension agent (alcohol)) in a reactor. Water is used as a solvent. Catalysts (peroxides) are added to the reactor and an exothermic polymerization reaction takes place. The blend slurry is removed from the reactor and separated (stripped) into reacted polymer and unreacted monomer using continuous heated stripping columns. Recovered VCM is compressed and condensed by refrigeration and reprocessed. Non-condensable gasses (NCGs) from the recovery process are sent to a thermal oxidizer to control final emissions.

Wastewater containing VCM is stripped of VCM before being discharged to the wastewater treatment system. The polymerized slurry (PVC) is dewatered by centrifuges and dried in rotary dryers or a fluid bed dryer. Particulate emissions from the dryers are controlled by cyclones. Particulate emissions from hold bins and silos are controlled by filters. PVC lost from the main process stream by spillage, specification deficiency, or collected by filters is bagged and declared "off spec". Properly processed PVC is pneumatically conveyed into ground silos, bags, or railroad cars and shipped to customers. The annual PVC production capacity for this facility is 400,000,000 pounds.

In accordance with Rule 62-210.200(148)(a), F.A.C., vinyl chloride is a hazardous air pollutant (HAP). Rule 62-210.200(243)(c), F.A.C., states that vinyl chloride is a regulated air pollutant. In addition, Rule 62-204.800, F.A.C., 40 CFR Part 61, Subpart F-- National Emission Standard for Vinyl Chloride, is defined as the applicable regulation for plants which produce one or more polymers containing any fraction of polymerized vinyl chloride.

The Title V application declares that the plant has a self-imposed emissions cap of 55 TPY of vinyl chloride. In accordance with 62-213.420(3)(c)1.c., F.A.C., the major source threshold (the facility emits or has the potential to emit) for any HAP is 10 TPY. Because the facility has the potential to emit greater than 10 TPY of vinyl chloride, a HAP, it is a major source of air pollution and is subject to Title V of the Act. The facility also has a self-imposed emissions cap of 79.34 TPY of particulate matter (PM).

#### Thermal Oxidizer (Emission Unit 019) [40CFR61.65]

Gases from the reactors, blowdown tanks, column feed tanks, and VCM stripping columns are directed to the VCM recovery system. Water that has been exposed to VCM is processed through a wastewater stripper. VCM from the wastewater stripper is also directed to the VCM

recovery system. All of these gases are compressed and condensed in the VCM recovery system. VCM that is recovered is reintroduced into the polymerization process. Gases that cannot be compressed and condensed are sent to the thermal oxidizer. This natural gas fired unit burns all waste gases, primarily NCGs, from the VCM polymerization process. The thermal oxidizer has a Bendix Model 700 wet scrubber to control emissions. An ambient air monitoring system is installed to continuously monitor the exhaust stack of the wet scrubber. This is a regulated emission unit.

Handling and Storage, Bins & Silos (Emission Unit 022) [40CFR61.64]

Based on the particle size, purity, and quality, PVC is moved through different plant process flows. Emission controls through handling and storage are primarily concerned with controlling PM. This is a regulated emission unit. The handling and storage flow includes:

**Sweco Filters:** PVC slurry is pumped from the stripping columns to the Sweco Filters. Here the PVC slurry is processed through a wet screen. Venting is direct to the atmosphere.

**Blend Tanks:** After the PVC slurry has been screened it is pumped into the blend tanks. From the blend tanks, the wet PVC is pumped to the dryers. Venting is direct to the atmosphere.

**Holding Bins:** Dry PVC is discharged from the dryers into the holding bins. Displaced air in the holding bins is discharged through four openings. PM emissions are controlled by filter socks and the Alpine Baghouse.

**Railcar Suction Blower:** This blower is used to remove residual PVC left in the bottom of railcars. A suction hose is connected to the blower and used to transfer the PVC resin to the blower. From the blower, the PVC can be transferred to the ground silos.

**Ground Silos:** Eight silos can receive the PVC from the dryers and bulk handling system. Each ground silo uses a baghouse to control PM emissions.

**Inside Loading:** PVC resin from the ground silos, holding bins, and railcar cleanout is pneumatically moved into railcars. The transport air released into the railcar is sucked through the bag filter hoppers. Filtered PVC is fed back to the railcar. Emissions are controlled by a baghouse.

**Over Track Silos:** Eight silos receive PVC from the dryers and/or ground silos. From the over track silos the PVC is loaded into railcars. The silos are vented to each other and the empty space above the PVC acts as a settling chamber. Seven of the silos vent back through their inlets that are manifolded into a baghouse. The eighth silo is plumbed separately from the other seven silos to allow it to process a different grade of PVC. Emissions from this silo are controlled by a different baghouse.

Reactor Opening Losses (Emission Unit 024) [40CFR61.64]

The polymerization of the VCM takes place in the reactor vessels. While the reactor vessels are being used to process VCM, they are not vented to the atmosphere. After an appropriate number of batches have been reacted and/or reactor maintenance is needed, reactors are taken out of service. Prior to opening, steam stripping is used to reduce the concentration of VCM in reactors. Upon achieving an appropriate VCM concentration, the reactors are opened to the atmosphere. All the VCM remaining in opened reactors vent directly to the atmosphere through the opening. This is a regulated emission unit.

North and South Rotary Dryers & Niro Dryer (Emission Unit 025) [40CFR61.64]

The PVC slurry processed from either the North Line or South Line Reactors is piped into the their corresponding blend tanks. From the blend tanks, the PVC slurry can be processed through both the North and South Rotary Dryers or the Niro Dryer.

Niro Dryer: The PVC slurry is first centrifuged to remove excess water. This water is sent to the wastewater treatment system. The PVC wet cake that comes from the centrifuge is then fed into the fluid bed dryer. As the PVC wet cake dries, it moves through the first and second stage of the Niro Dryer. A cyclone for each stage controls emissions. Both cyclones are vented through the same stack.

North and South Rotary Dryers: The PVC slurry is first centrifuged to remove excess water. This water is sent to the wastewater treatment system. The PVC wet cake that comes from the centrifuge is then fed into the dryers where heated air is used to dry the PVC. Both the North and South Dryers' hot air discharge is vented through a pair of parallel cyclones with a common vent.

This is a regulated emission unit.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
019	Thermal Oxidizer
022	Handling and Storage, Bins & Silos
024	Reactor Opening Losses
025	North and South Rotary Dryers & Niro Dryer

*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 provided to the permittee for information purposes only:

Statement of Basis

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received June 14, 1996

Additional Information Request dated November 15, 1999

Additional Information Response received February 3, 2000

## **Section II. Facility-wide Conditions.**

### **The following conditions apply facility-wide:**

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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(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. 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. Facility Start-Up The Pace facility shall insure compliance with applicable rules prior to beginning operations.  
[Rule 62-4.160, F.A.C.]
6. Facility Emission Limits Based on the Initial Title V Permit Application received June 14, 1996, Westlake PVC Corporation has self-imposed emissions limits for PM and VCM. PM emissions shall not exceed 79.34 TPY. VCM emissions shall not exceed 55 TPY.

**7. Test Methods and Procedures** Emissions tests are required to show continuing 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. Tests results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.  
[Rule 62-297.310, F.A.C.]

Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.  
[Rules 62-297.310(2) & (2)b, F.A.C.]

**8. Not federally enforceable. 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 control devices or systems deemed necessary and ordered by the Department.  
[Rule 62-296.320(1)(a), F.A.C.]

**9. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- Maintain all roads in a manner that will prevent fugitive particles from being entrained by vehicular traffic.
- Watering shall be performed on all problem areas when necessary.
- Fugitive PVC shall be swept and collected immediately to prevent entrainment by the wind.
- The particulate washdown system in the rail car loading area shall be maintained and used.
- Control all material transfer points to prevent particulate loss.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 14, 1996]

**10.** 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.]

**11.** 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, Fax: 850/595-8096

**12.** Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air and EPCRA Enforcement Branch, Air Enforcement Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9055, Fax: 404/562-9164

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

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

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

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
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019	Thermal Oxidizer
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**The following specific conditions apply to the emissions unit(s) listed above:**

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

**A.1. Capacity.** The annual production of PVC shall not exceed 400,000,000 pounds. This equates to a production average of 45,662 pounds per hour. Annual production shall be determined by using a 12 month rolling average based on the actual quantity of PVC shipped out of the plant each month. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**A.2. 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.3. Vinyl Chloride Emissions.** Vinyl chloride emissions shall not exceed 10ppm (average for 3-hour period). The equivalent allowable emission rate, at 10ppm, is 0.46 pounds per hour or two tons per year. [40CFR61.65(b)(9)(ii)]

#### **Monitoring of Operations**

**A.4.** Compliance with the vinyl chloride emissions limit shall be demonstrated by maintaining the following parameters during all operational periods in which emissions occur:

a) Monitoring for the presence of a flare pilot flame shall be conducted in accordance with [40CFR61.65(c)(2)(i)].

b) A continuous emission monitor (CEM) shall sample emissions from the thermal oxidizer stack 20 times per hour.

[40CFR61.65(c)(2)(i)]

c) Span checks shall be conducted every 12 hours.

[40CFR61.68(c)]

d) A scrubber, used to control emissions from the thermal oxidizer, must be functioning while the thermal oxidizer is in operation. The scrubber shall be interlocked to the thermal oxidizer. A scrubber failure shall both shut a valve closing the VCM gas stream and shut down the thermal oxidizer.

[Rule 62-4.160 F.A.C.]

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

**A.5. Emissions Test.** See Common Conditions Subsection **E1**.

[40CFR61]



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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
022	Handling and Storage, Bins & Silos

**The following 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 not exceed 20% opacity.  
[Rules 62-296.320(4)(b), F.A.C.]

**B.3. Vinyl Chloride Emissions.** Vinyl chloride emissions for this emissions unit is accounted for by emissions emitted from the North and South Rotary Dryers & Niro Dryer (Emissions Unit 25).  
[40CFR61.64(e)]

**Test Methods and Procedures**

**B.4. Visible Emissions** See Facility-wide Condition 3 for the test method. Visible emissions testing shall be conducted on the baghouse vents and shall take place each year. The testing shall be conducted for a minimum of 60 minutes.  
[Rules 62-296.320(4)(b), F.A.C.]

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

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
024	Reactor Opening Loss

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

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

**C.1. Capacity.** The annual production of PVC shall not exceed 400,000,000 pounds. This equates to a production average of 45,662 pounds per hour. Annual production shall be determined by using a 12 month rolling average based on the actual quantity of PVC shipped out of the plant each month.

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

**C.2. 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.3. Vinyl Chloride Emissions.** The reactor opening loss from each reactor is not to exceed 0.02g vinyl chloride/kg (0.00002 lb vinyl chloride/lb) of polyvinyl chloride product, with the product determined on a dry solids basis. At 400,000,000 pounds per year of PVC production, VCM emissions shall not exceed 4.0 TPY. The 4.0 TPY VCM emissions limit for reactor opening loss shall include VCM losses when a reactor is used as a stripper.

[40CFR61.64(2)]

**Monitoring of Operations**

**C.4.** For stripping operations (or reactors used as strippers) used to attain emission limits, emissions are to be tested in accordance with 40CFR61.67(g)(3).

[40CFR61.67(g)(3)]

**Test Methods and Procedures**

**C.5. Emissions Test** See Common Conditions Subsection E1.

[40CFR61]

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

**E.U.**

**ID No.    Brief Description**

025        North and South Rotary Dryer & Niro Dryer

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

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

**D.1. Capacity.** The annual production of PVC shall not exceed 400,000,000 pounds. This equates to a production average of 45,662 pounds per hour. Annual production shall be determined by using a 12 month rolling average based on the actual quantity of PVC shipped out of the plant each month.

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

**D.2. 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**

**D.3. Vinyl Chloride Emissions.** The weighted average residual VCM concentration in all grades of PVC resin processed through the stripping operation, measured immediately after the stripping operation is complete, may not exceed 400 ppm on each calendar day or 275 ppm annual average for all other PVC resins, including latex resins, averaged separately for each type of resin. The annual vinyl chloride emissions for the facility shall not exceed 55 TPY. The maximum hourly VCM emissions limit based on 400 ppm is 18.26 pounds per hour.

[40CFR61.64(e)(1)(ii) & Rule 62-204.800, F.A.C.]

**D.4. Visible Emissions.** Visible emissions shall not exceed 5% opacity .

[Rule 62-296.320, F.A.C.]

**D.5. Particulate Matter.** The PM emissions emitted from the dryers shall not exceed 38 pounds per hour. (Note: The facility wide emissions limit for PM is 79.34 TPY.)

[Initial Title V Permit Application received June 14, 1996]

**Monitoring of Operations**

**D.6.** Cyclones used to control PM shall be in operation while PVC is being processed through any dryer.

[Rules 62-4.160]

**D.7.** For stripping operations (or reactors used as strippers) used to attain emission limits, emissions are to be tested in accordance with 40CFR61.67(g)(3). The testing shall be conducted for a minimum of 60 minutes.  
[40CFR61.67(g)(3)]

**D.8. Excess Emissions** See Common Conditions Subsection **E1**.  
[40CFR61]

**Test Methods and Procedures**

**D.9. Emissions Test** See Common Conditions Subsection **E1**.  
[40CFR61]

**D.10. Visible Emissions**. See Facility-wide Condition **3** for the test method. Visible emissions testing shall be conducted on each cyclone vent. The testing shall take place each year. The testing shall be conducted for a minimum of 60 minutes.  
[Rules 62-296.320, F.A.C.]

**D.11. Particulate Matter**. Particulate matter testing shall be conducted on each cyclone vent. The testing shall take place prior to an application for permit renewal. Testing shall be conducted in accordance with EPA Method 5.  
[Rule 62-297, F.A.C.]

**Subsection E. Common Conditions**

{Permitting Note: The following conditions are placed here as a convenience and to avoid duplication. See specific conditions in Subsections A through D for applicability.}

**E.1. 40CFR61 Subpart F--National Emission Standard for Vinyl Chloride**

\*\*CMS [=] continuous monitoring system  
[electronic file name: 11300352.xls]

## Appendix H-1, Permit History/ID Number Changes

Westlake PVC Corporation  
Pace Plant

**DRAFT Permit No.:** 1130035-001-AV  
**Facility ID No.:** 1130035

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### Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date <sup>1,2</sup>	Revised Date(s)
019	Thermal Oxidizer	1130035001AC AO57-158843	4/22/96 8/31/89	4/22/01 8/1/94		
022	Handling and Storage, Bins & Silos	1130035001AC AO57-158843	4/22/96 8/31/89	4/22/01 8/1/94		
024	Reactor Opening Loss	1130035001AC	4/22/96	4/22/01		
025	North and South Rotary Dryers & Niro Dryer	1130035001AC AO57-158843	4/22/96 8/31/89	4/22/01 8/1/94		

#### Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
- 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.  
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Westlake PVC Corporation  
Pace Plant

DRAFT Permit No.: 1130035-001-AV  
Facility ID No.: 1130035

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**      **Brief Description**  
-019      Thermal Oxidizer

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Vinyl Chloride	N/A	8760	Not exceed 10 ppm	0.46	2.0			40CFR61.65(b)(9)(ii)	

**E.U. ID No.**      **Brief Description**  
-022      Handling and Storage, Bins & Silos

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Visible Emissions	N/A	8760	Not exceed 20% opacity	N/A	N/A			Rule 62-296.320(4)(b), F.A.C.	

**E.U. ID No.**      **Brief Description**  
-024      Reactor Opening Loss

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Vinyl Chloride	N/A	8760	Not to exceed 0.02g vinyl chloride/kg of polyvinyl chloride product	N/A	4			40CFR61.64(2)	

**E.U. ID No.**      **Brief Description**  
-025      North and South Rotary Dryers & Niro Dryer

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Vinyl Chloride	N/A	8760	Not to exceed 275 ppm	18.26	55			40CFR61.64(e)(1)(ii)	
Visible Emissions	N/A	8760	Not exceed 5% opacity	N/A	N/A			Rule 62-296.320(4)(a)2, F.A.C.	
PM	N/A	8760		38	79.34**			Title V Application	

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes only.

\*\* Facility wide.



[electronic file name: 11300351.xls]

**Table 2-1, Summary of Compliance Requirements**

Westlake PVC Corporation  
Pace Plant

DRAFT Permit No.: 1130035-001-AV  
Facility ID No.: 1130035

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.      Brief Description**  
-019      Thermal Oxidizer

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base	Min. Compliance Test	CMS**	See permit condition(s)
			Frequency	Date *	Duration		
Vinyl Chloride	N/A	See Permit Conditions				yes	

**E.U. ID No.      Brief Description**  
-022      Handling and Storage, Bins & Silos

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base	Min. Compliance Test	CMS**	See permit condition(s)
			Frequency	Date *	Duration		
Visible Emissions	N/A	EPA Method 9	annual		1 hour		

**E.U. ID No.      Brief Description**  
-024      Reactor Opening Loss

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base	Min. Compliance Test	CMS**	See permit condition(s)
			Frequency	Date *	Duration		
Vinyl Chloride	N/A	See Permit Conditions	reactor open			no	

**E.U. ID No.      Brief Description**  
-025      North and South Rotary Dryers & Niro Dryer

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base	Min. Compliance Test	CMS**	See permit condition(s)
			Frequency	Date *	Duration		
Vinyl Chloride	N/A	See Permit Conditions	before stripper column exit			no	
Visible Emissions	N/A	EPA Method 9	annual		1 hour		

Notes:

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.