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MAY 14 2002

P.O. Box 1027  
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BUREAU OF AIR REGULATION

May 9, 2002

Certified Mail No.: 7000 0520 0025 9579 5925

Mr. Doug Neeley  
Air, Pesticides, and Toxics Management Division  
USEPA Region IV  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

RE: Source Subject to 112(j) MACT Application, Part 1  
Florida Facility ID # 1130035

Dear Mr. Neeley:

The Clean Air Act Amendments of 1990 require that USEPA promulgate maximum achievable control technology (MACT) emissions control standards for hazardous air pollutants (HAP's) by May 15, 2002 for equipment or processes in certain named source categories. It is our understanding that USEPA will miss the May 15, 2002 deadline for promulgating emissions standards for numerous source categories and therefore will trigger the statutory "MACT Hammer" under Section 112 (j) of the Clean Air Act Amendments.

Under 40 CFR 63.50 - 63.56 which implements the Section 112 (j) regulations, facilities that are major sources of HAP's and that operate units that may fall within one or more of the source categories where no emission standards have been promulgated must submit a part 1 Section 112 (j) MACT Application by May 15, 2002. The Part 1 response provides basic information about the facility and identifies the relevant source categories and types of emission points belonging to the relevant source categories at the facility.

"The Westlake PVC Corporation at Pace, Florida is idled. However, it would be a major source for hazardous air pollutants and operates emissions units that may fall within one or more of the affected source categories." Therefore, we have enclosed the Part 1 MACT information - Source Subject to Section 112 (j) Provisions 40 CFR 63.50 through 63.56 and 63.105.

Please note that Westlake has identified the relevant units according to the information available at this time and reserves the right to withdraw any or all units

as determined by the final rule applicability of each source standard.

If there are any further questions concerning this information, please contact Mr. Donald Copeland Environmental Supervisor at 270-395-4860 Ext. 227.

Very truly yours,

WESTLAKE PVC CORPORATION



Jerry D. Farmer  
Vice President, Manufacturing

JDF:beg: MACT Hammer Part 1 App\_cover.doc

Attachments

cc: Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

file

**Westlake PVC  
Corporation  
Pace, Florida**

**Source Subject to Section 112(j) Source Identification**

1) Source Name Westlake PVC Corporation

2) Source ID No. 1130035

**Physical Location**

3) Street Address 4385 HWY 90

4) City Pace

5) County Santa Rosa

6) State Florida

7) Zip Code 32571-2064

**Mailing Address (if different than physical location)**

8) Address Box 1027

9) City Calvert City

10) County Marshall

11) State Kentucky

12) Zip Code 42029

**Applicability Determination**

13) Is your facility a major source of hazardous air pollutants (HAP)? If not, you need not complete the rest of this form.

Yes

No

*A major source is any contiguous area under common control that emits or has the potential to emit, considering controls in the aggregate, at least 10 tons per year of any single HAP or 25 tons per year total HAPS.*

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<p>14) Do you own or operate an affected source in a source category for which EPA has not promulgated standards under 40 CFR 63? If so, which one(s)?  <u>NESHAP for PVC and Copolymer Production and Organic Liquid Distribution (OLD)</u>  <u>EEEE</u></p> <p>If not, you need not complete the rest of this form.  (See Table of Promulgated Regulations, Table of Proposed Regulations, and Table of Upcoming Regulations at <a href="http://www.epa.gov/ttn/atw/eparules.html">www.epa.gov/ttn/atw/eparules.html</a> to determine if your standard has not been promulgated.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>15) Provide a brief description of the major source and its activities: (This Plant is now Idled)</p> <p>The Westlake PVC facility manufactures PVC resin and is already covered by 40 CFR 61 Subpart F, National Emission Standard for Vinyl Chloride.</p>	
<p>16) Provide a brief description of the affected source(s) in the relevant source category(ies):</p> <p>This facility has process equipment which is already covered under the Vinyl Chloride NESHAP part 61 Subpart F and will also be under the <b>NESHAP for PVC and Copolymer Production.</b></p>	

17) Identify any sources that have MACT determinations under section 112(g): None

### Certification and Signature of Responsible Official

18) I certify that the information contained in this application to be accurate and true to the best of my knowledge:

Responsible Official:



Signature

Vice-President Manufacturing  
Title

Jerry D. Farmer  
Printed name of Signatory

5-9-02  
Date

*A responsible official as required by 401 KAR 52:001:*

- *The president, vice president, secretary, or treasurer of a corporation that owns the facility or a duly authorized representative that is responsible for the overall operation of the facility.*
- *An owner of the facility.*
- *A principal executive officer if the facility is owned by the federal, state, city or county government.*
- *A ranking military officer if the facility is located at a military base.*
- *A general partner of a partnership that owns the facility.*



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

May 16, 2002

Mr. Jerry D. Farmer  
Vice President, Manufacturing  
Westlake PVC Corporation  
P.O. Box 1027  
Calvert City, KY 42029

Re: 112(j) Notification Information Submittal – Florida Facility ID # 1130035

Dear Mr. Farmer:

Thank you for submitting the referenced information in your letter dated May 9, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to a “112(j) MACT application, Part 1,” the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.  
Bureau of Air Regulation

“More Protection, Less Process”

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