MEMO TO PERMITTING FILE

DATE: November 19, 2008

FROM: Danny Stubbs A.A.

THROUGH: Cindy Zhang-Torres, P.E., Permitting Supervisor

To: Permitting Section **AIRS ID No: 1190030**

On October 24, 2008, the department received a letter from James Young of Charlotte Pipe and Foundry Company regarding the use of a portable sandblaster at the facility. Charlotte pipe will utilize a Grainger portable sandblaster model 6ZA38 with a hopper capacity of 80 pounds. The sandblaster will require an 80 PSI air supply and will have a flow of 9 CFM when using a 3/32 inch nozzle or 11 CFM when using a 7/64 inch nozzle. The new sandblaster will only be operated inside a facility building and inside an enclosure. No particulate matter from the operation is expected to make it to the outside atmosphere.

During the next permitting revision or renewal, the new portable sandblaster should be included as an exempt activity in the permit. The description included above should be verified and revised (if need) prior to its inclusion in the permit.

Referred by: Danny Stubbs

Date: 10/27/2008

Addressed by: have in Permit No. 119 0030 - 012 - AF
Permit Engineer

CHARLOTTE PIPE AND FOUNDRY COMPANY PLASTICS

DIVISION

January 6, 2009

Mr. Danny Stubbs
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. of Environmental Protection

JAN 0 9 2009

Southwest District

RE: Response to Notice of Permit Determination

Charlotte Pipe and Foundry Company, Wildwood, Florida

Facility ID: 1190030

FDEP Permit No.: 1190030-011-AF

Dear Mr. Stubbs:

This letter serves to advise you that because Reese Sumrall, Jr. will be retiring this year, your technical contact for the Charlotte Pipe and Foundry Company-Plastics Division has changed. The following individuals have replaced Mr. Sumrall as your technical contacts effective January 1, 2009:

PRIMARY CONTACT:

James Neubauer, Jr. - Environmental Engineer

Phone: (704) 226-8335 Fax: (704) 291-3204

Email: jneubauer@charlottepipe.com

SECONDARY CONTACT:

Nicholas Peth – Senior Processing and Product Development Engineer

Phone: (704) 291-3377 Fax: (704) 291-3204

Email: npeth@charlottepipe.com

If you have any questions in the future, please do not hesitate to contact the above mentioned individuals.

Sincerely,

C. Leon Salter, Jr. Vice President

Charlotte Pipe and Foundry Company – Plastics Division



PIPE AND FOUNDRY COMPANY PLASTICS

DIVISION

November 20, 2008

Dept. of Environmental Protection

NOV 2 4 2008

Southwest District

Mr. Danny Stubbs
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

RE: Response to Notice of Permit Determination

Charlotte Pipe and Foundry Company, Wildwood, Florida

Facility ID: 1190030

FDEP Permit No.: 1190030-011-AF

Dear Mr. Stubbs:

Charlotte Pipe and Foundry Company, Plastics Division (CPFC) has received the Florida Department of Environmental Protection (FDEP) Notice of Permit Determination regarding modifications to the facility's PVC Storage Silo 3 and PVC Storage Silo 5. The modifications included switching the loading hoses for the two silos, thus switching the maximum loading rates of the two silos. With the modifications, Silo 3 would go from a maximum loading rate of 13,000 lb/hr to 15,000 lb/hr and Silo 5 would go from a maximum loading rate of 15,000 lb/hr to 13,000 lb/hr.

The FDEP has determined that the modifications described above will require a revised Federally Enforceable State Operation Permit (FESOP) that must be public noticed. Per our discussions with your office and our own internal discussions, CPFC has decided to <u>not</u> continue with the modifications detailed above and will operate the silos as currently described in our FESOP (Permit No.: 1190030-011-AF).

In the future, when the need for additional modifications and equipment arise that require a permit modification, CPFC may revisit this issue and submit a permit application the modification of these silos. CPFC greatly appreciates your time reviewing this matter. Should you have any questions or require any additional information, please contact me at (352) 748-8100 or Mr. James Neubauer of CPFC at (704) 226-8335.

Singerely,

ames Young

Plant Manager

cc: File

J. Neubauer, Charlotte Pipe

Post Office Box 220, Wildwood, FL 34785

Phone: (352) 748-8100 Fax: (352) 748-3202

MEMORANDUM

To:

Mara Grace Nasca

District Air Program Administrator

Through:

Cindy Zhang-Torres, P.E. Air Program Permitting Supervisor

From:

Danny Stubbs D. A.

Date:

11/12/2008

Day 30:

12/12/2008

Subject:

Permit Determination for Charlotte Pipe Letter Dated October 21, 2008.

Based on the information provided by Charlotte Pipe in a letter received on October 24, 2008, it appears that the use of a portable sandblaster at their facility is exempt from permitting. They describe the portable sandblasting operation as an indoor activity with no emissions to the outside atmosphere. Therefore, I believe this activity is exempt under Generic Emission Unit or Activity Exemption, Rule 62-210.300(3)(b).



PIPE AND FOUNDRY COMPANY PLASTICS

DIVISION

October 21, 2008

Mr. Jim McDonald Florida Department of Environmental Protection Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Dept. of Environmental Protection

OCT 24 2008

Southwest District

RE:

New Equipment Notification

Charlotte Pipe and Foundry Company, Wildwood, Florida

Facility ID: 1190030

FDEP Permit No.: 1190030-011-AF

Dear Mr. McDonald:

Charlotte Pipe and Foundry Company, Plastics Division (CPFC) is submitting this new equipment notification for your files. CPFC has ordered and will be utilizing a Grainger portable sandblaster model # 6ZA38. The portable sandblaster will have a hopper capacity of 80 pounds and will require a flow rate of 9 CFM at 80 PSI with a 3/32 inch nozzle or a flow rate of 11 CFM at 80 PSI with a 7/64 inch nozzle.

The new sandblaster will only be operated inside a facility building and inside an enclosure to ensure that no particulate matter resulting from the sandblaster operation can make it to the outside atmosphere. With that said, in accordance with Rules 62-210.200 (Def. "Emission Limiting Standard") and 62-210.300 FAC, this piece of equipment is not reasonably expected to emit pollutants to the atmosphere and is exempt from permitting.

Again, this new equipment notification is being submitted for your files. Should you have any questions or require any additional information, please contact me at (352) 748-8100 or Mr. James Neubauer of CPFC at (704) 226-8335.

Sincerely,

James Young Plant Manager

cc: File

J. Neubauer, Charlotte Pipe

Post Office Box 220, Wildwood, FL 34785 Phone: (352) 748-8100 Fax: (352) 748-3202

MEMORANDUM

To:

Mara Grace Nasca

District Air Program Administrator

Through:

Cindy Zhang-Torres, P.E.

Air Program Permitting Supervisor

From:

Danny Stubbs $\Delta \Delta$.

Date:

10/22/2008

Day 30:

11/2/2008

Subject:

Permit Determination for Charlotte Pipe Letter Dated September 26, 2008.

Based on the information provided by Charlotte Pipe in a letter received on October 3, 2008, it appears that a construction permit is required for the activity described in the letter. The determination letter addresses whether or not switching the loading hoses for PVC Storage Silo 3 and PVC Storage Silo 5 requires a permit. Because these silos have different permitted maximum loading rates specific in their current permit (1190030-011-AF), switching the hoses on the silos could potentially result in a switch of the maximum loading rate. As a result, I believe a construction permit is required to modify the maximum loading rates.



CHARLOTTE PIPE AND FOUNDRY COMPANY

VIA FEDEX - STANDARD

Dept. of Environmental Protection

OCT 03 2008

September 26, 2008

Mr. Jim McDonald Florida Department of Environmental Protection Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926

Southwest District

RE:

Federally Enforceable State Operation Permit Modification Charlotte Pipe and Foundry Company, Wildwood, Florida

Facility ID: 1190030

FDEP Permit No.: 1190030-011-AF

Dear Mr. McDonald:

Charlotte Pipe and Foundry Company, Plastics Division (CPFC) is submitting the following request for a modification of the Federally Enforceable State Operation Permit (FESOP) at its Wildwood, Florida facility. Facility silos are currently permitted for the following maximum unit loading rates:

Emission Unit ID#	Emission Source ID #	Emission Source Description	Emission Point ID #	Maximum Unit Loading Rates
002	ES-02	PVC Storage Silo 2	EP-02	16,000 lbs/hr
002	ES-03	PVC Storage Silo 3	EP-03	13,000 lbs/hr
002	ES-04	PVC Storage Silo 4	EP-04	15,000 lbs/hr
002	ES-05	PVC Storage Silo 5	EP-05	15,000 lbs/hr
002	ES-06	PVC Storage Silo 6	EP-06	13,000 lbs/hr
002	ES-07	PVC Resin Storage Silo 7	EP-07	15,000 lbs/hr
007	ES-36	CPVC Compound Storage Silo 1	EP-24	3,500 lbs/hr

The facility has made some recent equipment changes where the loading hoses for PVC Storage Silo 3 and PVC Storage Silo 5 where switched. The maximum loading rate of each silo was affected by this equipment change and essentially the maximum loading rates of each silo were switched. With the equipment change, the current maximum loading rates that the facility wishes to have its FESOP revised to reflect, are as follows:



CHARLOTTE PIPE AND FOUNDRY COMPANY

Emission Unit ID#	Emission Source ID #	Emission Source Description	Emission Point ID #	Maximum Unit Loading Rates
002	ES-02	PVC Storage Silo 2	EP-02	16,000 lbs/hr
002	ES-03	PVC Storage Silo 3	EP-03	15,000 lbs/hr
002	ES-04	PVC Storage Silo 4	EP-04	15,000 lbs/hr
002	ES-05	PVC Storage Silo 5	EP-05	13,000 lbs/hr
002	ES-06	PVC Storage Silo 6	EP-06	13,000 lbs/hr
002	ES-07	PVC Resin Storage Silo 7	EP-07	15,000 lbs/hr
007	ES-36	CPVC Compound Storage Silo 1	EP-24	3,500 lbs/hr

Since <u>NO</u> permitted emission limits or throughput rates have been or will be exceeded by this change, it is CPFC's hope that this letter requesting a modification to the facility's permit will suffice. CPFC greatly appreciates your time reviewing this matter. Should you have any questions or require any additional information, please contact me at (352) 748-8100 or Mr. James Neubauer of CPFC at (704) 226-8335.

Sincerely,

James Young
Plant Manager

cc:

File

J. Neubauer, Charlotte Pipe

Dept. of Environmental Protection

OCT 03 2008

Southwest District

Owner(Facility Name, if needed): Charlotte Pipe and Foundry Company Peripet (Name: operation permit revision Project Name: operation permit revision Needed Received 10/10/06 Fee Submitted 2 correct Incorrect Incorre	Air Permitting Supervisor - Required			
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City	MON	ROE				Stat	e NC	Zip 28110	- 🗆	Country U.	S.A.	
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ermitting Application - Permit Detail and Log Permit 1999/2000/2009/2009/2009/2009/2009/2009/	≚ XÌ
POINT AIRS ID 1190030 STATUS A OFFICE SWD SW: TAMPA SITE NAME CHARLOTTE PIPE & FOUNDRY PLASTIC DIV COUNTY SUMTER	
OWNER/COMPANY CHARLOTTE PIPE AND FOUNDRY CO/PLASTIC DI	
AIR Permit # 1190030 - 011 - AF Project # 011 CRA Reference # 266945	
Permit Office SWD (DISTRICT) Agency Action Issued	- car
Project Name OPERATION PERMIT REVISION Desc revise operation permit to incorporate 010-AC and convert the opera	
Type/Sub/Des AF /2B Minor Source - Other Sample \$1000 Logged 10/12/2006	
Received 10/10/2006 Issued 02/02/2007 Expires 02/02/2012 OGC Fee 1000.00 Fee Recd 1000.00 Dele Override NONE	
Related Party	
Role APPLICANT Begin 10/12/2006 End	
Name SUMRALL, REESE JR Company CHARLOTTE PIPE & FOUNDRY CO, PLASTIC	
Address 4210 OLD CHARLOTTE HWY.	
City MONROE State NC Zip 28110 Country U.S.A.	
Phone 704-291-3211 Fax 704-348-6406	
Processor GRAHAM_J Processor GRAHAM_J Y Active 12/11/2006 Inactive Events	



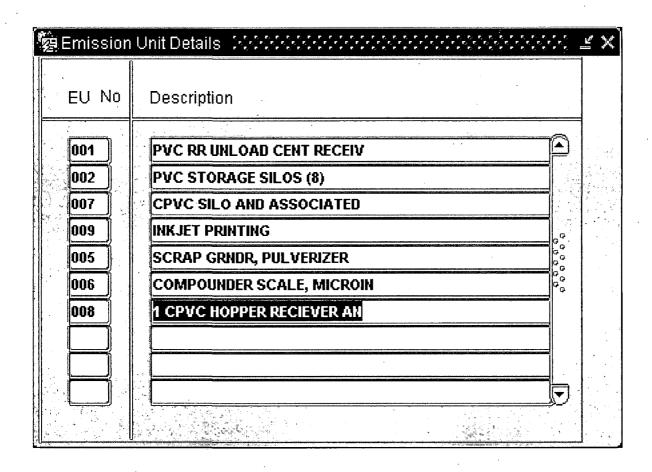
Department of Environmental Protection

Jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

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Department of Environmental Protection

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Return to 1190030

New Search

Save File as: d:\inetpub\qsource\air\psum\1190030.011.AF.F.ZIP

File '1190030.011.AF.F.ZIP' was uploaded successfully to appprod.dep.state.fl.us

Permit Summary Record was successfully inserted/updated



Department of **Environmental Protection**

Jeb Bush Governor Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

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SWD Air Permits	Users Manual
Facility ID 1190030 Owner/Facility Name Charlotte Pipe and Foundry/Plastic Div	To add Owner/ Facility, click below
Project Number 1190030-011-AF Issued 2/2/2007 Eng JG	Add Owner/Facility
Facility Descriptio Other (see comments)	To see 296.
Source Description Other (see comments)	MACT, or NSPS codes, click below
296 NSPS NSPS	296 List
Fuel Primary Control Equipmen	MACT List
For fuels: ng=natural gas; lg=landfill gas; p=propane; t=tires; uo=used oil; w=wood; c=coal, list allowed fuel oils as a string of #s (ex. 23456)	NSPS List
Project Description/Comments	
PVC extrusion facility, includes railcar unloading, storage silos, hoppers, grinder.	
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Jeb Bush Governor

Department of Environmental Protection

Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

MEMORANDUM

To:

Mara Grace Nasca

District Air Program Administrator

Through:

Cindy Zhang-Torres, P.E.

Air Program Permitting Supervisor

From:

Joseph Graham 2

Permit Engineer Specialist

Date:

February 1, 2007

Subject:

Recommend permit 1190030-011-AF for Charlotte Pipe and Foundry Company be

issued.

I recommend permit 1190030-011-AF for Charlotte Pipe and Foundry Company be issued.

There have been no changes to the permit as it was originally proposed with the Intent to Issue.

The public notice was properly published on January 16, 2007, as required and as of this date no comments have been received.

Day 90 for this application is February 12, 2007.