Dyplast Products, LLC
Dyplast Products

Facility ID No. 0251104
Miami-Dade County

Title V Air Operation Permit Renewal

Permit No. 0251104-007-AV
(Renewal of Title V Air Operation Permit No. 0251104-006-AV)

Permitting & Compliance Authority:
Miami-Dade County
Permitting, Enforcement and Regulatory Affairs
Air Quality Management Division
701 N.W. 1st Court
Second Floor
Miami, Florida 33136

Telephone: 305/372-6925
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DRAFT PERMIT

PERMITTEE:
Dyplast Products, LLC
12501 NW 38 Avenue
Opa Locka, FL 33054

Permit No. 0251104-007-AV
Dyplast Products
Facility Id. No. 0251104
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit No. 0251104-006-AV for the above referenced facility. The Dyplast Products facility is located in Miami-Dade County at 12501 NW 38 Avenue, Opa Locka, Florida. UTM Coordinates are: Zone 17, 573.64 East and 2863.39 North. Latitude is: 25° 38'07" North; and, Longitude is: 80° 25' 09" West.

The 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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DRAFT
Renewal Application Due Date: DRAFT
Expiration Date: DRAFT

(Draft)

_____

H. Patrick Wong, Chief
Air Quality Management Division
Permitting, Environment and Regulatory Affairs
Miami-Dade County

HPW/db

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The Dyplast Products, LLC facility engages in the production of polystyrene (EPS) and polyurethane (ISO) for construction, architectural, and insulation purposes. The EPS is produced by expanding polystyrene beads, situating the beads in the EPS mold, and then fusing the beads by drawing steam through them while in the mold. The ISO is produced by adding a catalyst to a mixture, and then extruding the mixed product, allowing it to expand. Emissions units at the facility consist of the EPS production process, the ISO production process, one 200 hp boiler, and four dust collectors.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Expandable Polystyrene (EPS) Production Process
002	Polyurethane (ISO) Production Process
003	One (1) Kewanee 200 hp Boiler
004	Four (4) Torit Dust Collectors

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received February 3, 2012, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is a Synthetic Minor for purposes of PSD in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations – 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297	All
Local Rule – Chapter 24 – Code of Miami-Dade County	All

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.]

FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1), F.A.C.]
{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
b. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
c. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d. Landscaping or planting of vegetation.
e. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
f. Confining abrasive blasting where possible.
g. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.; and Permit No. 0250014-041-AC]

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available

for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:
a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

FW10. The permittee shall submit all compliance related notifications and reports required of this permit the Permitting, Environment and Regulatory Affairs (PERA) at the following address:

Miami-Dade County
Permitting, Environment and Regulatory Affairs
Air Quality Management Division
701 NW 1 Court, Suite 400
Miami, Florida 33136-3912

FW11. Special Compliance Tests: When the PERA, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PERA.
[Rule 62-297.310(7)(b) F.A.C.]

Subsection A. Emissions Units 001, 002, 003, and 004

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	**Expandable Polystyrene Production (EPS) Process** Equipment utilized in the expandable polystyrene production process: • Expander • EPS Mold • Blower
002	**Polyurethane (ISO) Production Process** Equipment utilized in the polyurethane manufacturing process: • Six (6) aboveground storage tanks • Pre-mixer tank • Heat Exchanger • Inline Mixer • Extruder • Urethane Conveyor • Chiller • Air Compressor
003	**One (1) Kewanee 200 hp Boiler** Model No.: H3S-200 Fuel: Natural gas fired, 8.0 MMBtu/hr
004	**Four (4) Torit Dust Collectors** Dust Collector #1 – Torit Model 64PJD10; collects particulates from bun stock saws Dust Collector #2 – Torit Model DFT 3-12; collects particulates at horizontal gantry saw Dust Collector #3 – Torit Model 16PJD8; collects EPS particulates at the mold machine Dust Collector #4 – Torit Model 16PJD8; collects EPS particulates at the grinder

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity – Expandable Polystyrene (EPS) Production Limit: The total production of expandable polystyrene (EPS) shall not exceed 4,512 tons in any consecutive 12-month period.
[Rules 62-4.160(2); 62-210.200(PTE) and 62-4.070(3), F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.2. Permitted Capacity – Polyurethane (ISO) Production Limit: The total production of polyurethane (ISO) shall not exceed 3,600 tons in any consecutive 12-month period.
[Rules 62-4.160(2); 62-210.200(PTE) and 62-4.070(3), F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.3. Methods of Operation – Fuel Restrictions: Primary fuel used shall be natural gas, with No.2 diesel fuel (containing no more than 0.05% sulfur content by weight) allowed for back-up purposes only.
[Rules 62-213.410 and 62-4.070(3), F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.4. 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.; Air Construction Permit No. 0251104-005-AC]

Emission Limitations, Test Methods and Standards

A.5. Facility-Wide Volatile Organic Compounds Emissions: Facility-wide total emissions of volatile organic compounds (VOC), including hazardous air pollutants (HAP), shall not equal or exceed 242 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.6. Facility-Wide Total HAP Emissions: Total emissions of all hazardous air pollutants (HAP) shall not equal or exceed 25 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.7. Individual HAP Emissions: Emissions of any individual hazardous air pollutant (HAP) shall not equal or exceed 10 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.8. Blowing Agent Notification: The facility currently uses pentane as the blowing agent. The owner or operator shall notify in writing, to the PERA, any changes in the type and/or amount of blowing agents used in the facility. Any change in blowing agent shall be approved by the PERA prior to use.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.9. Sulfur Dioxide Emissions Standards: No person, firm, corporation or other entity shall cause, let, permit, suffer or allow the emission of sulfur dioxide from any stationary fossil fuel fired steam generating source located in Miami-Dade County exceeding 0.55 pounds per million Btu heat input, when liquid fuel is burned.
[Rule 62-4.070(3) F.A.C.; Miami-Dade County, Chapter 24-41.3(2)(c); Air Construction Permit No. 0251104-005-AC]

Recordkeeping and Reporting Requirements

A.10. VOC Content and Emissions: The owner or operator shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission unit(s), by recording and maintaining the following information:

a. The VOC content for each material containing or emitting VOC.
b. The material utilization rate on a monthly basis, for all materials containing or emitting VOC used at the referenced emission unit(s).
c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emission rate for VOC, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.11. Individual & Total HAP Content and Emissions: The owner or operator shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission unit(s), by recording and maintaining the following information:

a. The individual and total HAP contents for each material containing or emitting HAP.
b. The material utilization rate on a monthly basis, for all materials containing or emitting HAP used at the referenced emission unit(s).
c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emission rate for individual and total HAP, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.12. Production Rate Log: The permittee shall record and maintain a log of the amount of expandable polystyrene (EPS) and polyurethane (ISO) produced at the facility. The log shall contain the following information:

a. The total production (in tons), on a monthly basis, of product (EPS & ISO) produced at the referenced emissions unit(s), calculated for the preceding month no later than 10 days after the end of that month.
b. A rolling consecutive 12-month total production rate (in tons) calculated from the monthly totals for the previous twelve calendar months.
c. The records for the EPS and ISO processes shall be kept separately.

[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.13. Allowable Fuels: The owner or operator shall maintain records to demonstrate that each shipment of fuel oil does not exceed 0.05% sulfur by weight, and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294-90, adopted and incorporated by reference in Rule 62-297.440(1).
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251104-005-AC]

A.14. Supporting Documentation: The permittee shall maintain supporting documentation, such as Material Safety Data Sheets, purchase orders, usage and disposal records, etc., and shall include sufficient information to determine compliance. The log and documents shall be kept at the facility and made available for PERA inspection for a minimum of five (5) years from the date of such records. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
[Rule 62-4.070(3) F.A.C.; Rule 62-213.440(b)2 F.A.C.]

A.15. Other Reporting Requirements: See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION IV. APPENDICES

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix TV, Title V General Conditions.
Appendix B, Requirements for On-Spec Used Oil Fuel.
Appendix RR, Facility-Wide Reporting Requirements.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History
Statement of Basis