

February 26, 2013

NOTICE OF AIR POLLUTION PERMIT

CERTIFIED MAIL: 7006 0810 0000 7059 9062
RETURN RECEIPT REQUESTED

ISSUED TO:

Mr. Buddy H. Bussey III
President
International Cushioning Company, LLC
240 Boundary Road
Marlboro, New Jersey 07746

Permit Number: 0251144-004-AO
Issue Date: February 26, 2013
Expiration Date: February 25, 2018

Project: State of Florida Non-Title V Air Operation Permit Renewal for the International Cushioning Company, LLC. facility.

Facility Description: Facility manufactures polystyrene packaging peanuts in a process that mixes steam with polystyrene resin pellets. The expandable polystyrene pellets contain the blowing agent pentane.

SIC No. 3086 Manufacturer of Plastic Foam Products: Polystyrene Foam
NAICS No. 326140 Polystyrene Foam Products Manufacturing

Facility Location: 4380 E. 11 Avenue, Hialeah, FL. 33013

Lat./Long. N 25⁰ 51' 46" / W 80⁰ 15' 38"

UTM Coordinates: Zone: 17 East (km): 574 North (km): 2863

This is Permit Number 0251144-004-AO to operate an air pollution source issued by the **Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management pursuant to Chapter 24, Code of Miami- Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a State Air Operation Permit authorizing the operation of the emissions unit described in the permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the RER as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the RER the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the RER rules. The above named owner or operator 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 RER and made a part hereof and specifically described in this permit.

PERMIT CONTENTS:

- Part I -- Summary Information
- Part II -- Facility-Wide Specific Conditions
- Part III -- Emissions Unit Specific Conditions
- Appendix A – General Conditions

PART I -- SUMMARY INFORMATION

This permit addresses the following air pollution emissions unit(s):

| Emissions Unit Number | Emissions Unit Description |
|-----------------------|--|
| 001 | <p>Facility manufactures expandable polystyrene products. The manufacturing process is three (3) stages of expandable polystyrene pellet (EPS) expansion and curing using three foam expander machines. Steam generated by two (2) boilers burning natural gas is used in the expansion process. A pneumatic duct system transfers expanded pellets to product storage nets for curing. Maximum Production Rate – 360 lbs. per hour.</p> <p><i>Two (2) Superior, Model No. 5-156 Natural Gas Boilers for steam generation. Each boiler is 30 HP, and has a heat input of 1,260,000 BTU/Hr. [These boilers are categorically exempted pursuant to 62-210.300(3)(a)(3) F.A.C.]</i></p> |

SIGNIFICANT DATES:

Air Operation Permit Renewal Application & Fee Received February 1, 2013

REGULATORY CLASSIFICATION:

This facility is classified as a non-Title V, Natural Minor source for air pollution.

PERMIT HISTORY:

| Permit No | Project Type Description | Issue Date | Expiration Date |
|----------------|--|------------|-----------------|
| 0251144-001-AC | Initial Air Construction Permit for installation of polystyrene pellet expanding equipment | 08/08/2003 | 08/07/2004 |
| 0251144-002-AO | Initial Air Operation Permit | 07/26/2004 | 07/25/2009 |
| 0251144-003-AO | Air Operation Permit Renewal | 09/10/2009 | 02/13/2011 |

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management located at 701 NW 1 Ct, Suite 400, Miami, Florida 33136.
- 1.2 Citation Format: In this permit, references to **F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.**
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S.
[Rule 62-4.160 F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the RER or other departments or agencies.
- 1.7 Renewal of This State Permit Required: An application for renewal of this air operating permit must be submitted to the RER, Air Quality Management **at least 60 days prior** to the expiration date of this permit. To apply for renewal of an operating permit, the applicant shall submit the appropriate application form in triplicate, the appropriate application fee, all required compliance test results, and such additional information as the RER may require by law.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]
- Note that public notice may be required again at the time of renewal or revision of this permit if the facility or permit is materially changed from that described by this permit.
[Rule 62-210.350(4)(a) F.A.C.]
- 1.8 County Permit Renewal: A request for renewal of the Miami-Dade County annual air operating permit must be submitted annually to the RER Air Quality Management on the appropriate form, **by May 31st of each calendar year**, along with the appropriate Miami-Dade County permit fee.
[Chapter 24-18, Code of Miami-Dade County]

2.0 General Pollutant Emissions Limiting Standards

2.1 Objectionable Odor Prohibited: No person shall 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.]

2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, 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 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]

2.3 Volatile Organic Compounds/Organic Solvents Emissions:
No person shall 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 emissions control devices or systems deemed necessary and ordered by the RER.

Such controls include the following:

- Tightly cover or close all VOC containers when they are not in use.
- Tightly cover all open tanks, which contain VOCs when they are not in use.
- Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
- Confine rags used with VOCs to tightly closed, fireproof containers when not in use.
- Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1) F.A.C.]

2.4 Unconfined Emissions of 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 include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.
- Substitution of powdery materials with granular or pelletized materials, where possible.

[Rule 62-296.320(4)(c) F.A.C.]

3.0 Operation Requirements

- 3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C.]
- 3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing the best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the RER for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700 (1) & (4) F.A.C.]

4.0 Compliance Testing Requirements

- 4.1 Test Notification: Unless otherwise specified in this permit, the RER Air Facilities Section shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
[Rule 62-297.310(7)(a) 9 F.A.C.]
- 4.2 Testing at Capacity: Compliance testing (when required) shall be conducted with the emissions units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emissions units). If an emissions unit is not tested at permitted capacity, the emissions unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2) F.A.C.]
- 4.3 Special Compliance Tests: When the RER, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emissions 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 RER.
[Rule 62-297.310(7)(b) F.A.C.]

5.0 Reporting and Record Keeping Requirements

- 5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, the owner or operator shall notify the RER in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the RER.
[Rule 62-210.700(6) F.A.C.]
- 5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the RER. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the RER rules.
[Rule 62-4.130 F.A.C.]
- 5.3 Retain Records: All records required by this permit shall be kept by the owner or operator and made available for the RER inspection for a minimum of three (3) years from the date of such records.
[Rule 62-4.160(14)(b) F.A.C.]
- 5.4 Compliance Test Reports: Compliance test reports (when required) shall be submitted to the RER, Air Quality Management, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the RER to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emissions limiting standard.
- The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- All measured and calculated data required to be determined by each applicable test procedure for each run.
- The detailed calculations for one run that relate the collected data to the calculated emissions rate.
- The applicable emissions standard, and the resulting maximum allowable emissions rate for the emissions unit, plus the test result in the same form and unit of measure.

[Rule 62-297.310(8)(a) & (b) F.A.C.]

- 5.5 Annual Report Required: The Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County RER, Air Quality Management office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.
[Rule 62-210.370(3) F.A.C.]

PART III -- EMISSIONS UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emissions unit(s):

| Emissions Unit Number | Emissions Unit Description |
|-----------------------|--|
| 001 | <p>Facility manufactures expandable polystyrene products. The manufacturing process is three (3) stages of expandable polystyrene pellet (EPS) expansion and curing using three F.M.I. All-in-one Foam Expander machines, Model No. ICC 1200 Foam Loosefill Expander. Steam generated by two (2) boilers burning natural gas is used in the expansion process. A pneumatic duct system transfers expanded pellets to product storage nets. Maximum Production Rate – 360 lbs. per hour.</p> <p>Raw materials used are expandable polystyrene pellets with an average pentane content of 5.25%. The expanded pellets have an average pentane content of 2.09%. Pentane is a volatile organic compound (VOC) emitted during the expansion process.</p> |

1.0 Emissions Limiting Standards and Operation Restrictions

- 1.1 Visible Emissions: The owner or operator shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the opacity of which is equal to or greater than 20%.
[Rule 62-296.320(4)(b) F.A.C.; Air Construction Permit No. 0251144-001-AC]
- 1.2 Facility Wide VOC Emissions: Facility-wide emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), shall not equal or exceed 100 tons in any consecutive 12 month period.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251144-001-AC]
- 1.3 Facility Wide HAP Emissions: Facility-wide total emissions emissions of all hazardous air pollutants (HAPs) 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. 0251144-001-AC]
- 1.4 Individual HAP Emissions: Facility-wide 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. 0251144-001-AC]
- 1.5 Hours of Operation: The referenced emissions unit(s) shall not operate in excess of 8,300 hours in any consecutive 12 month period.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251144-001-AC]
- 1.6 Blowing Agent Notification: The owner or operator shall notify in writing, to the RER, any changes in the type and/ or amount of blowing agents used in the facility.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251144-001-AC]

2.0 Compliance Monitoring and Record Keeping Requirements:

- 2.1 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 emissions unit(s), by recording and maintaining the following information:

