Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:

G.A.P. Roofing of Florida, LLC
Mid-America Industrial Park, 4444 Hunt Street
Pryor, OK 74361

I.D. Number:	0470015
Permit/Cert Number:	0470015-004-AO
Date of Issue:	7/16/2012
Expiration Date:	07/31/2014

Authorized Representative:
Mr. Glen Passmore, President

Project: Air Operation Permit Renewal

PROJECT AND LOCATION

This is the final air operating permit, which authorizes renewal operation of Emission Unit 001 – Asphalt Saturated Felt Manufacturing Operation. **EU001 was last operated in July 2009. Therefore, Permit No. 0470015-004-AO extends EU001 expiration date only until July** 31, **2014.** The existing facility is an Asphalt Saturated Felt Manufacturing Operation (Standard Industrial Classification No. 2952). The existing facility is located in Hamilton County, at 12120 Southwest County Road 137, Jasper, Florida. The UTM coordinates are Zone 17, 317.01km East, and 3372.32km North.

CONTENTS

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Emissions Unit Specific Conditions
Section 4. Appendices

STATEMENT OF BASIS

This air pollution operating permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Khalid Al-Nahdy

Khalid A. Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on July 16, 2012, to the persons listed below.

Glen Passmore, G.A.P. Roofing - (Julie@gaproofinginc.com)
David Swaroop, G.A.P. Roofing of Florida, LLC- (dave.swaroopgap@gmail.com)

Clerk Stamp

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.

Shane Maghen July 16, 2012

(Clerk) (Date)

FACILITY DESCRIPTION

GAP Roofing of Florida, LLC is an asphalt-roofing manufacturer. The facility operates a line 1 for asphalt saturated felt.

Line 1 – Asphalt Saturated Felt

At Line 1, organic felt is unrolled from an unwind stand onto a dry looper, which maintains a constant tension on the material. From the dry looper the felt will pass into a saturator dip section where the felt is drawn over a series of rollers, with the bottom rollers submerged in hot asphalt at 400º F to 480 º F. During the next step, heated drying-in drums provide the heat for the asphalt to penetrate the felt. The saturated felt then passes through water-cooled rolls onto the finish floating looper, and then is rolled and cut to product size on the roll winder. The product is then stored.

Incoming asphalt for the saturation process is stored in a 19,500-gallon receiving/saturator run tank (Tank A). The tank contents are maintained at a temperature of approximately 425 º F. Heated asphalt from the tank will be conveyed to the saturator at Line 1. Heat for the process is supplied by a 3.0 MMBtu/hour burner.

The emissions from Line 1 are controlled by a CECO Mist Collector System with a fiberglass/charcoal pre-filter. A sample picture of the unit is as shown below.

REGULATED EMISSION UNITS:

EU No.	EU Description	Control Device
001	Line #1 – Asphalt saturated felt manufacturing operation consisting of asphalt receiving/saturator run tank, saturator, drying-in drums and cooler.	CECO Mist Collector System

Generic Emissions Unit Exemptions: The following emission units or pollutant-emitting activities meet the criteria for the Generic Emissions Unit Exemption pursuant to Rule 62-210.300(3)(b) 1., F.A.C:

3.0 MMBTU/hr Natural gas fired heater
1.8 MMBTU/hr Natural gas fired heater
Granules handling and storage

DIAGRAM 1 PROCESS FLOW DIAGRAM FOR LINE 1

REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

The facility is subject to Appendix A 40 CFR 60, Subpart A – General Provisions (NSPS) and 40 CFR 60, Subpart UU—Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year, and individual and total hazardous air pollutants are less than 10 and 25 tons per year, respectively in accordance with Chapter 62-210, F.A.C.

The facility is subject to the following regulations:

- Chapter 62-4, F.A.C. - Permits
- Rule 62-4.160, F.A.C.- General Permit Conditions
- Rule 62-4.130, F.A.C. – Plant Operation - Problems
- Chapter 62-210, F.A.C. – Stationary Sources – General Requirements
- Rule 62-210. 300, F.A.C. – Permits Required
- Rule 62-210. 350, F.A.C. – Public Notice and Comment
- Rule 62-210.650, F.A.C. – Circumvention
- Rule 62-210.700, F.A.C. – Excess Emissions
- Chapter 62-296, F.A.C. – Stationary Sources – Emissions Standards
- Rule 62-296.320, F.A.C.- General Pollutant Emissions Limiting Standards
- Rule 62-296.410, F.A.C. – Carbonaceous Fuel Burning Equipment
- Chapter 62-297, F.A.C. – Stationary Sources – Emissions Monitoring
- Rule 62-297.310, F.A.C. – General Test Requirements

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department:

Application for Air Permit – Non-Title V Source received May 29, 2012.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting & Compliance Authority: The permitting and compliance authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. The telephone number is (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to this District Office.

2. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. NSPS Appendix A

3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

6. Construction Permit Required: Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.
   [Rule 62-210.300(1)(a), F.A.C.]

7. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
   [Rule 62-210.700(5), F.A.C.]

8. A completed **Application for Non-Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.
   [Rules 62-4.055, 62-4.090, and 62-4.220, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

The following specific conditions apply to the Emissions Units and Emission Points listed below:

Emissions Unit	Brief Description
001	Line #1 – Asphalt saturated felt manufacturing operation consisting of asphalt receiving/saturator run tank, saturator, drying-in drums and cooler. The emissions from Line 1 are controlled by a CECO Mist Collector System with a fiberglass/charcoal pre-filter.

The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, 62-297 and 40 CFR 60, Subpart UU—Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture**.** Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.

OPERATIONAL PARAMETERS

1. **Hours of Operation**. The hours of operation are not restricted: 24 hours/day; 7 days/week; 52 weeks/year (8760 hours/year and 8784 during a Leap Year).
   [Rules 62-4.160(2) & (14)(b), 62-210.200(PTE), F.A.C.]

2. **Maximum Operation Rate**. The maximum saturated felt production rate is 70,200 tons per year.
   [Permit No. 0470015-002-AC, Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

3. **General Provision of 40 CFR 60**. The permittee shall comply with the requirements of 40 CFR Part 60, Subpart A- General Provisions. See attached Appendix A. [40 CFR 60.1 (a)]

EMISSION LIMITS AND STANDARDS

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

4. **Emissions Limit(s).** The permitted emissions limits for the saturator are as follows:

Affected Source	Pollutant	Emission Limit	Rule
Saturator	Particulate Matter (PM)	0.8 lb/ton of saturated felt or smooth-surfaced roll roofing produced	40 CFR 60.472(a)(1)(ii)
		5.85 lb/hr; 28.08 tons/year	Permit No. 0470015-002-AC
	Visible Emissions (VE)	Not more than 20% opacity	40 CFR 60.472(a)(2)

5. **Opacity Limit for Asphalt Storage Tank A.** The owner or operator shall cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from the asphalt storage tank(s) are ducted to a control device for a saturator, the combined emissions shall meet the emission limit contained in specific condition No. 4 of this permit during the time the saturator control device is operating. At any other time the asphalt storage tank(s) must meet the opacity limit specified above for storage tanks.
[40 CFR 60.472 (c)]

MONITORING OF OPERATIONS

6. **Pressure Drop Monitoring**. The owner or operator shall monitor and record the pressure drop across the mist collector once every 8-hour period when operating. The normal operating range for the pressure drop shall be between 2 to 10 inches of water (max 12 inches).
[40 CFR 60.473 (c), Permit No. 0470015-002-AC]

TEST METHODS AND PROCEDURES

7. **Operating Rate During Compliance Test**. For saturators, if the final product is saturated felt or smooth-surfaced roll roofing, the tests shall be conducted while 6.8-kg (15-lb) felt is being produced.
[40 CFR 60.474 (a)(2)]

8. **PM/VE Compliance Test**. The owner or operator shall determine compliance with the particulate matter and VE standards as follows:

(a) The emission rate (E) of particulate matter shall be computed for each run using the following equation:

E=(cs Qsd)/(PK)

where:

E=emission rate of particulate matter, kg/Mg (lb/ton).
cs=concentration of particulate matter, g/dscm (gr/dscf).
Qsd=volumetric flow rate of effluent gas, dscm/hr (dscf/hr).
P=asphalt roofing production rate or asphalt charging rate, Mg/hr (ton/hr).
K=conversion factor, 1000 g/kg [7000 (gr/lb)].

(b) Method 5A, as stated in 40 CFR 60 Appendix A shall be used to determine the particulate matter concentration (cs) and volumetric flow rate (Qsd) of the effluent gas. For a saturator, the sampling time and sample volume for each run shall be at least 120 minutes and 3.00 dscm (106 dscf), and for the blowing still, at least 90 minutes or the duration of the coating blow or non-coating blow, whichever is greater, and 2.25 dscm (79.4 dscf).

(c) For the saturator, the asphalt roofing production rate (P) for each run shall be determined as follows: The amount of asphalt roofing produced on the saturated felt process lines shall be obtained by direct measurement. The asphalt roofing production rate is the amount produced divided by the time taken for the run.

(d) Method 9, as stated in 40 CFR 60 Appendix A and the procedures in 40 CFR 60.11 shall be used to determine opacity.

[40 CFR 60.474 (b)&(c); Rule 62-297.320, F.A.C.]

9. **Compliance Test Frequency**. The owner or operator shall conduct the performance test for PM emissions as stated in **Specific Condition No.8** on a 5-year basis, prior to obtaining a renewed operation permit. The owner or operator shall conduct VE test as stated in **Specific Condition No.8** annually, during each federal fiscal year (October 1 – September 30) to demonstrate compliance with the opacity limit.

[Rule 62-297.310(7)(a) 3 & 4, F.A.C.]

10. This facility is subject to the requirements of SECTION 2. ADMINISTRATIVE REQUIREMENTS.

11. This facility is subject to the attached Combined Appendices A-D and Appendices E (NSPS Appendix A).

12. EU001 was last operated in July 2009. Therefore, Permit No. 0470015-004-AO extends EU001 expiration date only until July 31, 2014. Provided the facility meets the requirements in Rule 62-210.300(2)(a)3.b., the permit can be renewed again in 2014 should the facility not operate prior to the 2014 expiration date. The expiration date of the new permit will be 10 years from the date of shutdown, i.e. expire July 31, 2019.

[Rule 62-210.300(2)(a)3.b.; Rule 62-210.300(2)(a)3.c.]

13. Facility is subject to Section 4 Appendix C, Common Coditions.