E-Stone USA Corporation
E-Stone
Facility ID No. 0550049
Highlands County

Title V Air Operation Permit
Permit No. 0550049-007-AV
(Revision to Permit No. 0550049-004-AV)

Permitting Authority

State of Florida
Department of Environmental Protection
Air Resource Management, South District

2295 Victoria Avenue, Ste. 364
Fort Myers, Florida 33901

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Compliance Authority

State of Florida
Department of Environmental Protection
Air Resource Management, South District

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Florida Department of
Environmental Protection
South District Office
P.O. Box 2549
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Governor

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Lt. Governor

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Secretary

DRAFT/PROPOSED PERMIT

PERMITTEE:
E-Stone USA Corporation
8041 Haywood Taylor Blvd.
Sebring, Florida 33870

Permit No. 0550049-007-AV
E-Stone
Facility ID No. 0550049
Title V Air Operation Permit

The purpose of this permit is to revise the Title V air operation permit (No. 0550049-004-AV) for the above referenced facility. This revision adds the operation of *Polymerizing Line No. 2* (EU-004) and the associated *Regenerative Thermal Oxidizer RTO* (EU-008) for Polymerizing Line 2.

The E-Stone facility is located in Highlands County at 8041 Haywood Taylor Blvd., Sebring, Florida 33870. UTM coordinates are: Zone 17, East (km) 455.5, and North (km) 3042.17. Latitude is: 27° 27′ 27.3996" North; and, Longitude is: 81° 21′ 9.3528" 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 shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Jon M. Iglehart
Director of
District Management

JMI/CBE/mf

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility is a cultured granite reinforced plastics manufacturing facility. The facility produces 4 foot by 8 foot slabs consisting of granite, polymer and limestone. The facility is comprised of two production lines. Each production line consists of three processes: nonmetallic mineral processing, polymerizing, and polishing. Granite rock and various aggregates are crushed, dried, and then screened during nonmetallic mineral processing. The polymerizing process takes place at one of two polymerizing lines. Each polymerizing line is enclosed in its own permanent total enclosure (PTE). During the polymerizing process the crushed aggregates are mixed with polyester resin. The mixture is conveyed to an enclosed room that is a PTE, poured into an open mold, and heated. The slab gets a thin layer of limestone on the bottom to strengthen the finished product. After the mold is cooled a wet grinder is used to smooth the rough edges and polish the surface. The two manufacturing lines are similar with the following differences: 1) Polymerizing Line No. 2 can produce twice as many cultured granite slabs as Polymerizing Line No. 1; and 2) Polishing Line No. 2 is equipped with additional equipment (an epoxy station, two (2) dryers, an oven and a baghouse). The polymerizing process has the potential to emit hazardous air pollutants, (HAP), primarily styrene emissions. HAP emissions are controlled by Regenerative Thermal Oxidizers (RTO) and are also vented through cyclones and baghouses to the atmosphere. Cyclones and baghouses throughout the facility control particulate matter (PM) emissions.

The facility has emission units activities which are insignificant emissions.

The facility is described in the application (DEP File No. 0550049-002-AC) as an automated open mold batch process using noncorrosive, high strength mechanical resin application. The open molding operation is non-atomized mechanical resin application with non-vapor suppressed resin. For purposes of 40 CFR 63 Subpart WWWW requirements, this facility is a new facility prior to startup.

Subsection B. Summary of Emissions Units. (Revisions are identified by italics).

EU No.	Brief Description
Regulated Emissions Units	
001	Non-Metallic Mineral Processing Line No. 1
002	Non-Metallic Mineral Processing Line No. 2
003	Polymerizing Line No. 1
004	*Polymerizing Line No. 2*
005	Regenerative Thermal Oxidizer (RTO) (Polymerizing Line No. 1)
006	Facility-Wide HAP
007	Polishing Line No. 2
008	*Regenerative Thermal Oxidizer (RTO) (Polymerizing Line No. 2)*

FACILITY REGULATORY CLASSIFICATION

- The facility is 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 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.

Subsection C. Applicable Regulations.

Based on the Title V Air Operation application received February 3, 2009, this facility is a major source of hazardous air pollutants (HAPs). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63 Subpart A – General Provisions	EU003, EU004, EU005, EU006,EU008
40 CFR 63 Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production	EU003, EU004, EU005, EU006, EU008
40 CFR 63, Subpart SS - National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process	EU003, EU004, EU005, EU006, EU008
62-296.320, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008
62-210.370, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007 EU008
62-213.440, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008
62-297.310, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008
62-210.700, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008
62-213.420, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008
62-4.160, F.A.C.	EU001, EU002, EU003, EU004, EU005, EU006, EU007, EU008

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. **Not federally Enforceable.** 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 unnecessary and ordered by the Department. Nothing is deemed necessary and ordered at this time.
[Rule 62-296.320(1)(a), F.A.C.]

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), 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. Minimize drop distances of dry materials when handling.
b. As necessary, provide wind breaks around material handling equipment.
c. As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and aggregate piles.
d. Enclosure or covering of conveyor systems.
e. Paving of driveways.

[Rule 62-296.320(4)(c), and 62-4.070(3), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report (AOR). 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.a. & 3. and (b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA)

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. 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. The permittee shall 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]

Subsection A. The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Non-Metallic Mineral Processing Line No. 1
002	Non-Metallic Mineral Processing Line No. 2

Emission units EU001 and EU002 are two (2) non-metallic mineral processing plants. Each plant dries and crushes glass and aggregate. EU001 is identical to EU002. Each processing line consists of conveyors, hoppers, a five (5) ton per hour (TPH) rotary dryer (Manufacturer Allgaier, Model TT 60/5 DOB AG), shakers, and a crusher. Each nonmetallic mineral processing line is equipped with a cyclone (ID No. DC1: Dustex, Model PC72) and a baghouse (ID No. DC2: Dustex, Model 3610-14-18). The emission units' start-up date was May 1, 2007.

Essential Potential to Emit (PTE) Parameters

A.1 Cyclones and Baghouses. Emissions units EU001 and EU002 shall be controlled by cyclones and a baghouses. The cyclones and baghouses shall be operated and maintained according to the manufacturer's specifications.

Replacement equipment and bags shall meet the minimum specifications below:

	Emissions Control			
EU No.	**ID No.**	**Control Devices**	**Design Flow Rates, acfm**	**Air-to-cloth ratio**
001	DC1	Baghouse / Cyclone	19,423	4.91:1
002	DC2	Baghouse / Cyclone	19,423	4.91:1

[Permit No. 0550049-003-AC]

A.2. Permitted Capacity. Non-Metallic Mineral Processing Line Nos. 1 and 2 (EU001 and EU002) are authorized to operate the rotary dryers at a maximum rate of 1 mmBtu/hr.
[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit No. 0550049-003-AC]

A.3 Methods of Operation.
a. *Fuels.* The fuels that are allowed to be burned in these units are:
(1) Propane, and
(2) Natural gas.
b. *Fuel Meters*: Fuel meters shall be installed on each line to record the actual fuel usage of each line.
[Rule 62-213.410, F.A.C.; and, Permit No. 0550049-003-AC.]

A.4 Hours of Operation. Each emissions unit shall not exceed 6106 hours/year.
[Rule 62-210.200(PTE),
F.A.C., Permit No. 0550049-003-AC]

Emission Limitations and Standards

A.5. Potential Emission. EU001 and EU002 have the potential to emit the following during any consecutive 12-month average:

EU No.	Pollutant	Potential Emissions
001	CO	0.26
	NO_X	0.31
	PM	1.38
	PM10	0.91
	SO_2	Insignificant
	VOC	Insignificant
002	CO	0.26
	NO_X	0.31
	PM	1.38
	PM10	0.91
	SO_2	insignificant
	VOC	Insignificant

[Permit No. 0550049-003-AC]

{*Permitting Note: The potential emissions identified in Specific Condition **A.5**. are for informational purposes only and are not enforceable.*}

Test Methods and Procedures

{See Subsection E. Common Conditions}

Recordkeeping and Reporting Requirements

{See Appendix RR, Facility-Wide Reporting Requirements, Subsection E. Common Conditions for additional requirements}

A.6 Recordkeeping. The owner or operator shall maintain daily, monthly, and consecutive 12 month records documenting the following for each Non-Metallic Mineral Processing Line (EU001 and EU002):

a. The amount of throughput (aggregate) processed;
b. Rotary dryer operating rates;
c. Type and amount of fuel burned (from fuel meter readings); and
d. Hours of operation.

These records need to be in a format that is readily available upon request by the Department.
[Rules 62-4.160(14), 62-213.440(1)(b)2, and 62-210.370(2)h, F.A.C.; Permit No. 0550049-003-AC]

Other Requirements

A.7 **Common Conditions.** These emissions units are subject to **Specific Conditions E.1. through E.11.** contained in Subsection **E. Common Conditions.**

Subsection B. The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
003	Polymerizing Line No. 1
004	*Polymerizing Line No. 2*
005	Regenerative Thermal Oxidizer (RTO) (Polymerizing Line No. 1)
008	*Regenerative Thermal Oxidizer (RTO) (Polymerizing Line No. 2)*

The facility is equipped with two polymerizing lines. Each polymerizing line consists of a mixing area, an enclosed room [a permanent total enclosure (PTE)] equipped with a polymerizing oven, a slab take off area, and a calibration area. Each polymerizing line's oven runs on electricity. Polymerizing Line No. 2 is able to produce twice as much product as Polymerizing Line No. 1.

The two polymerizing lines have a total of 3 baghouses and 2 cyclones to control PM emissions. Polymerizing Line No. 1's (EU003), PM emissions are controlled by a cyclone/baghouse combination (ID No. DC3, Zanetti, Model SN 05-10-25), and a Regenerative Thermal Oxidizer (RTO) (EU005). The combination cyclone/baghouse (DC3) controls PM emissions from Polymerizing Line No. 1's aggregate dosing area, polymerizing area within the PTE, slab take off, and calibration area. Polymerizing Line No. 2's (EU004), PM emissions are controlled by a baghouse (ID No. DC6, Dustex, Model 3610-14-18) a cyclone/baghouse combination (ID No. DC4, Dustex, Model 3610-14-18) and a Regenerative Thermal Oxidizer (RTO) (EU008). The baghouse (DC6) controls PM emissions from Polymerizing Line No. 2's aggregate dosing area and the polymerizing area within the PTE. The cyclone/baghouse combination (DC4) controls PM emissions from Polymerizing Line No. 2's slab take off #2 and calibration #2 areas.

The RTO's (EU005) and (*EU008*) installed on Polymerizing Lines No.1 and No. 2 do not capture and destroy 100 percent of the HAP emissions. HAP emissions not captured or destroyed by the RTO are emitted through cyclones and baghouses to the atmosphere.

Both Polymerizing Line Nos. 1 and 2 (EU003 and EU004) and the RTO's (EU005) and (*EU008*) are subject to and must comply with the applicable regulations in 40 CFR 63 Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions.

Essential Potential to Emit (PTE) Parameters

B.1 Cyclones and Baghouses. Emissions from EU003 and EU004 shall be controlled by RTO's, cyclones and baghouses. Air handling fans shall be equipped with adjustable "blast" gates for control and balance of air flow distribution. The cyclones and baghouses shall be operated and maintained according to the manufacturer's specifications. Replacement equipment and bags shall meet the minimum specifications below:

	Emissions Controls			
EU No.	**ID No.**	**Control Devices**	**Design Flow Rates, acfm**	**Air-to-cloth ratio**
003	DC3	Baghouse /Cyclone	16,097	3.95:1
004	DC4	Baghouse / Cyclone	22,357	5.65:1

004	DC6	Baghouse	19,423	4.91:1

EQUIPMENT

B.2 Regenerative Thermal Oxidizer (RTO) EU005 (Polymerizing Line No. 1)

The RTO's shall be maintained according to its manufacturer's specifications.

Parameter	Operating Parameter
Process Flow	6,972 SCFM*
Combustion Chamber Oxidation Temperature	1500◦F
Thermal efficiency	95%

*The RTO is variable speed thus the SCFM may vary.
[Permit No. 0550049-003-AC]

B.3 *Regenerative Thermal Oxidizer (RTO). EU008 (RTO) (Polymerizing Line No. 2. The variable speed RTO (EU008) is an Advantage Energy Group (AEG) Premier Series 15.0 regenerative thermal oxidizer (model number 7-RTO-95), with the design criteria described in the table below. The RTO controls HAP and VOC emissions inside the PTE on polymerizing line no. 2. HAP emissions not captured or destroyed by the RTO are emitted through cyclones and baghouses, specifically DC4 and DC6, to the atmosphere. The RTO shall be operated and maintained according to its manufacturer's specifications.*

Parameter	***Operating Parameter***
Process Flow	*15,000 SCFM**
Combustion Chamber Oxidation Temperature (Minimum)	*1500°F*
Thermal efficiency	*95%*

**The RTO is variable speed thus the SCFM may vary. [Permit No. 0550049-005-AC]*

B.4 RTO Operation.

a. *Manufacturer instructions*. The RTO's must be operated in accordance with the seller and/or manufacturer's written operation and maintenance instructions.
[Rule 62-4.070(3), F.A.C.; Permit No. 0550049-003-AC]

b. *NSPS requirements.* The RTO must be monitored and operated according to the procedures in 40 CFR 63 Subpart SS. [40 CFR 60.5855]

c. Authorized Fuel. The RTO (EU008) is authorized to burn natural gas.
[Rule 62-210.200(202), F.A.C.; Permit No. 0550049-005-AC]

B.5 Magnehelic Pressure Gauge. The owner or operator shall install, operate, and maintain magnehelic pressure gauges at each discharge stack on baghouses DC3, DC4 and DC6. The magnehelic pressure gauge shall be continuously operated when the two polymerizing lines and RTO are in operation. The magnehelic pressure gauges shall read in inches of water.
[Permit No. 0550049-003-AC]

B.6 Differential Pressure Gauge. The owner or operator shall install, operate and maintain a differential pressure gauge on each polymerizing line's PTE. The differential pressure gauge shall indicate a negative pressure at all times when the polymerizing line(s) are operating. The differential pressure gauge shall measure the pressure in inches of water. [Permit No. 0550049-003-AC]

B.7 Hours of Operation. These emissions units (EU003, EU004, and EU005, EU008) may operate continuously (8760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Permit No. 0550049-003-AC]

B.8 Methods of Operation.
a. *EU003 and EU004*. The polymerizing ovens on Polymerizing Line Nos. 1 and 2 (EU003, EU004) operate on electricity.
b. *EU005 and 008.* Both RTO's (EU005) and (EU008) are authorized to burn natural gas and propane gas.
c. *Fuel Meters*. Fuel meters shall be installed on the RTO lines to record the actual fuel usage.
[Rule 62-213.410, F.A.C.; Permit No. 0550049-003-AC]

B.9 Operation/Maintenance/Malfunction Manual. The permittee shall develop an Operation and Maintenance (O & M) and Malfunction Manual. The manual shall address the RTO, cyclones and baghouses. The O & M and Malfunction Manual shall be kept on site of the facility. [Permit No. 0550049-003-AC]

Emission Limitations and Standards

B.10 Potential Emissions - Primary Criteria Pollutants. Polymerizing Lines Nos. 1 and 2 **(**EU003 and EU004) and the RTO's (EU005**)** and (EU008) have the potential to emit the following pollutants during any consecutive 12 months:

EU No.	**Emissions (Tons)**					
	CO	**NO_X**	**SO_2**	**VOC**	**PM**	**PM10**
003	------	------	------	------	0.69	0.32
004	------	------	------	------	1.37	0.64
005	0.36	0.44	insignificant	50.67*	insignificant	Insignificant
008	1.79	-	insignificant	77.05*	insignificant	Insignificant

*VOC emissions includ**e** 50.67 TPY and 77.05 TPY (after controls) from the polymerizing lines not related to fuel emissions.

{*Permitting Note: The potential emissions identified in Specific Condition **B.10**. are for informational purposes only and are not enforceable.}*

Excess Emissions

{See Subsection E. Common Conditions for additional requirements}

Test Methods and Procedures

{See Subsection E. Common Conditions for additional requirements}

B.11 RTO Performance Testing. Any changes or modifications to the facility, including modifications to EU003, EU004, EU005, or EU008, may require additional performance testing that may be more frequent

than required by 40 CFR 63 Subpart WWWW. [Rules 62-4.030, F.A.C.; 62-213.400, F.A.C.; and 62-210.300, F.A.C.; Permit 0550049-003-AC]

B.12 Performance and Compliance Testing. All performance and compliance testing shall be conducted in accordance with the applicable regulations in 40 CFR 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions. [40 CFR 63 Subparts A, SS, & WWWW.

a. The owner or operator has conducted an initial compliance/performance test on and encompassing EU004 (Polymerizing Line 2) and EU008 (RTO).
b. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.

[Rules 62-297.310(7)(a)1 and 62-4.070(3)F.A.C., 40 CFR 63 Subparts A, WWWW, and SS]

B.13 Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(7)(a)9, F.A.C.; Permit No. 0550049-005-AC]

B.14 RTO Performance Testing. Any changes or modifications to EU008 may require additional performance testing that may be more frequent than required by 40 CFR 63 Subpart WWWW.
[Rules 62-4.070(3); 62-213.400 and 62-210.300, F.A.C.; Permit No. 0550049-005-AC]

B.15 Magnehelic Pressure Gauge Reading During Testing. The reading of each magnehelic pressure gauge shall be recorded during the initial performance test, periodic performance tests and annual compliance tests.
[Permit No. 0550049-005-AC]

Recordkeeping and Reporting Requirements

{See Subsection E. Common Conditions for additional requirements}

B.16 Reporting and Recordkeeping**.** All reporting and recordkeeping shall meet the applicable requirements in 40 CFR 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions.
[40CFR 63 Subparts A, SS, and WWWW; Permit 0550049-003-AC]

B.17 Magnehelic Pressure Gauges. The reading of each magnehelic pressure gauge shall be recorded during each stack test, including during the initial performance test, periodic performance tests, and annual compliance tests.
[Permit No. 0550049-003-AC]

B.18 Recordkeeping. The owner or operator shall maintain daily, monthly, and consecutive 12-month records documenting the following for each Polymerizing Line (EU003 and EU004) and the RTO's (EU005) and (EU008).

a. the pounds of resin used;
b. the quantity of each HAP containing material used; and
c. type and amount of fuel burned (amount from fuel meter readings).

These records need to be in a format that is readily available upon request by the Department.
[Rules 62-4.160(14), F.A.C.; 62-213.440(1)(b)2, F.A.C.; Permit 0550049-003-AC]

B.19 Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

Other Requirements

B.20 **Common Conditions.** These emissions units are subject to **Specific Conditions E.1. through E.11** **C**ontained in Subsection **E. Common Conditions.**C

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

EU No.	Brief Description
006	Facility Wide HAPs

The Polymerizing Line Nos. 1 and 2 (EU003 and EU004) and the RTO (EU005) collectively are EU006, Polymerizing Area Wide. This EU is designated for compliance and monitoring with 40 CFR 63 Subparts WWWW, SS, and A. The total HAP emissions shall not exceed the HAP emissions limit which is determined by the regulations of 40 CFR 63 Subpart WWWW. Both Polymerizing Line Nos. 1 and 2 (EU003 and EU004) and the RTO (EU005) and (EU008**)** are subject to and must comply with the regulations of 40 CFR 63 Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions.

Emission Limitations and Standards

{See Subsection E. Common Conditions for additional requirements}

C.1 HAP Emission Limits**.** The facility's HAP emissions shall be limited in accordance with the requirements of 40 CFR 63 Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Subpart WWWW requires monthly calculations of organic HAP emissions before and after controls in order to determine compliance demonstration. As required by 40 CFR 63 Subpart WWWW organic HAP emissions need to be calculated ***prior*** to any add-on controls in order to determine the applicable emission limits for the facility. If the facility's organic HAP emissions ***prior*** to add-on controls are less than 100 TPY, the facility is subject to the applicable limits in Table 3 of 40 CFR 63 Subpart WWWW. If the facility HAP emissions ***prior*** to add-on controls are 100 TPY or greater, the facility may be required to reduce the total organic HAP emissions from its operations by at least 95 percent by weight. Demonstration of compliance with the applicable emission limits (Table 3 or 95 percent reduction) may be met ***after*** add-on controls.
(Refer to 40 CR 63.5799, 63.5805, and 63.5810.) Permit No. 0550049-003-AC]

C.2 Organic HAPS. EU006 has the potential to emit the following HAPs:

Pollutant	Before Controls (TPY)	After Controls (TPY)
Styrene	98.79	63.18
Dimethyl phthalate	insignificant	Insignificant
Methanol	insignificant	Insignificant

HAP emissions shall be monitored and recorded for AOR purposes. The limits in the table (above in Specific Condition C.2.) are not enforceable limits. The enforceable HAP limits are defined in 40 CFR 63 Subpart WWWW which is made part of this permit.
[Permit No. 0550049-003-AC]

C.3 Site Specific Emission Factor. To demonstrate compliance in accordance with 40 CFR 60 Subpart WWWW, the owner or operator is authorized to use a site specific emission factor of 93.43 lbs. organic HAP per ton resin used for Line 1 and 138.68 lbs. organic HAP per ton resin for Line 2. These site specific emission factors shall not be authorized to be used in emission calculations for demonstrating compliance if

the facility is modified and/or after the expiration date of this permit. The site specific emission factors must be re-determined by performance testing (See Specific condition C.) upon any modification to the facility and prior to submitting a renewal application, if the owner or operator chooses to use a site specific emission factor upon modification or after the expiration date or this permit.
[40 CFR 63 Subpart WWWW]

Test Methods and Procedures

C.4 Performance and Compliance Testing. All performance and compliance testing shall be conducted in accordance with the applicable regulations in 40 CFR 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions.
[40 CFR 63 Subparts A, SS, and WWWW; Permit 0550049-003- AC]

Recordkeeping and Reporting Requirements

{See Appendix RR, Facility-Wide Reporting Requirements and Subsection E. Common Conditions for additional requirements}

C.5 Reporting and Recordkeeping**.** All reporting and recordkeeping shall meet the applicable requirements in 40 CFR 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63 Subpart SS, National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process, and 40 CFR 63 Subpart A, National Emissions Standards for Hazardous Air Pollutants for Source Categories, General Provisions.
[40 CFR 63 Subparts A, SS, and WWWW; Permit 0550049-003-AC]

C.6 Notification and Reporting Schedule. The owner or operator must submit the following to the Compliance Authority:

a. Notifications. The owner or operator must submit all notifications in Table 13 of 40 CFR 63 Subpart WWWW as required by 40 CFR 63.5905. If any information submitted in any notification is changed, the owner or operator must submit the changes in writing to the permitting authority within 15 calendar days after the change.

b. Reports. The owner or operator must submit each report in Table 14 of 40 CFR 63 Subpart WWWW as required by 40 CFR 63.5910.

I. Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

II. Each compliance report shall be postmarked no later than 30 days after the end of the semiannual reporting period.

[40 CFR 63, Subpart WWWW]

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

EU No.	Brief Description
007	Polishing Line No. 2/Epoxy Station

Polishing Line No. 2 (Simec Polishing Line 600) is a wet process. Polishing Line No. 2 consists of two (2) Comex CXM 4006 G (Serial Numbers 10198 and 10199) dryers and a Comex CXM 12006 G (Serial Number 10205) curing oven. A baghouse (Zanetti) is used to control emissions. Polishing Line No. 2 also includes an epoxy station.

Essential Potential to Emit (PTE) Parameters

D.1 Baghouse. Emissions unit EU007 shall be controlled by a baghouse. The baghouse shall be operated and maintained according to its manufacturer's specifications. Replacement equipment and bags shall meet the minimum specifications below:

EU No.	ID No.	Design Flow Rates, acfm
007	DC5	3,237

[Permit No. 0550049-003-AC]

D.2 Permitted Capacity.

a. The capacity is limited by the capacity, fuel, and emission limitations in Subsections A and B (requirements for EU001, EU002, EU003, EU004, and EU005).

b. The two dryers are authorized to operate at a maximum heat input of 153,000 Btu/hr.

c. The oven is authorized to operate at a maximum heat input of 1.25 mmBtu/hr.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit No. 0550049-003-AC]

D.3 Methods of Operation. The fuels that are allowed to be burned in this unit are propane, and natural gas.
[Rule 62-213.410, F.A.C.; and, Permit No. 0550049-003-AC.]

D.4 Hours of Operation. This emissions unit may operate continuously (8760 hours/year).
[Rule 62-210.200(PTE), F.A.C.; Permit No. 0550049-003-AC]

Emission Limitations and Standards

D.5 Potential Emissions. Polishing Line No. 2/Epoxy Station (EU007) has the potential to emit the following pollutants during any consecutive12 month period:

Pollutant	Tons (during any consecutive 12 month average)
CO	0.67
NO_X	0.82
SO_2	Insignificant
VOC	Insignificant
PM	Insignificant
PM10	Insignificant

{Permit No. 0550049-003-AC]

{*Permitting Note: The potential emissions identified in Specific Condition D. 4. are for informational purposes only. These limits are not enforceable.}*

Excess Emissions

{See Subsection E. Common Conditions for additional requirements}

Test Methods and Procedures

{See Subsection E. Common Conditions for additional requirements}

Recordkeeping and Reporting Requirements

{See Appendix RR, Facility-Wide Reporting Requirements and Subsection E. Common Conditions for additional requirements}

D.6 Recordkeeping. The owner or operator shall maintain daily, monthly, and consecutive 12 month records documenting the type and amount of fuel burned (amount from fuel meter readings). These records need to be in a format that is readily available upon request by the Department.
[Rules 62-4.160(14), F.A.C.; 62- 213.440(1)(b)2, F.A.C.; and 62-210.370(2)h, F.A.C.; Permit No. 0550049-003-AC]

Other Requirements

D.7 **Common Conditions.** This emissions unit is subject to **Specific Conditions E.1. through E.11.** contained in Subsection **E. Common Conditions.**

Subsection E. The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Non-Metallic Mineral Processing Line No. 1
002	Non-Metallic Mineral Processing Line No. 2
003	Polymerizing Line No. 1
004	Polymerizing Line No. 2
005	Regenerative Thermal Oxidizer (RTO) (Polymerizing Line No. 1)
006	Facility Wide HAPs
007	Polishing Line No. 2
008	Regeneration Thermal Oxidizer (RTO) (Polymerizing Line No. 2)

Essential Potential to Emit (PTE) Parameters

E. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

Unless otherwise specified, the averaging time for Specific Condition(s) **E.2.** is based on the specified averaging time of the applicable test method.

E.2 Visible Emissions (VE). VE for all cyclones and baghouses shall not exceed 5% opacity.
[Permit No. 0550049-003-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

E.3 Prohibited Excess Emissions. 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(4), F.A.C.]

E.4 Excess Emissions Notification. In case of excess emissions resulting from malfunctions, the permittee or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

Test Methods and Procedures

E.5 Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

E.6 Annual Compliance Tests. During each federal fiscal year (October 1st to September 30th), these EU(s) shall be tested to demonstrate compliance with the emissions standards for VE. VE testing shall be required on all cyclones and baghouses. VE testing is not required for the RTO.
[Rule 62-297.310(7), F.A.C. and Permit No. 0550049-003-AC]

E.7 Compliance Tests Prior to Renewal. Except as provided for in condition TR7 of Appendix TR, Testing Requirements, each cyclone and baghouse (DC1, DC2, DC3, DC4, and DC6) shall be tested to demonstrate compliance with the specified opacity standard for the associated emissions unit within the 12-month period prior to obtaining a renewed operation permit. A formal report of the testing along with the results shall be submitted with the renewal application.
[Rule 62-297.310(7)(a)3., F.A.C.; Permit No. 0550049-003-AC]

E.8 Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
Rule 62-297.310, F.A.C.]

E.9 Visible Emission. VE tests shall be performed in accordance with EPA Method 9, incorporated and adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.310(7), F.A.C.]

E.10 Performance Testing. A performance test for RTO(s) shall be conducted prior to renewal of the Title V operation permit in accordance with 40 CFR 63 Subpart WWWW.
[40 CFR 63 Subpart WWWW]

Recordkeeping and Reporting Requirements

E.11 Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION VI. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production.
Appendix NESHAP, Subpart SS - National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.