TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Storopack, Inc.

Hillsborough County

Federally Enforceable State Operating Permit

Application Number

0571205-007-AF

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 26, 2014

I. Project Description

A. Applicant:

Thomas G Eckel
Senior Vice President
Storopack, Inc.
4758 Devitt Drive
Cincinnati, Ohio 45246

B. Engineer:

Kevin Golden, P.E.
Universal Solutions, Inc.
8339 Stone Run Court
Tampa, FL 33615

C. Project and Location:

This permit authorizes the addition of a fourth expander. Also, the hourly EPS pellet production limit is being removed, as requested.

The project has been assigned NEDS Source Classification Code (SCC) No. 3-08-008-01-Plastic Foam Products, Expansion Process via Steam. The facility has been assigned SIC Industry No. 3086 –Plastic Foam Product Manufacturing. The project will take place at 4724 Transport Drive, Tampa, FL 33605. UTM Coordinates are 17-361.756 East and 3093.428 North.

D. Process and Controls:

This project authorizes the installation of a fourth expander. This facility is an expandable polystyrene (EPS) expansion plant. The facility makes styrofoam peanuts for shipping packages. Pre-shaped EPS pellets are run through three Big Wally EPS expanders. The expanders use steam to heat the pellets to soften them and to allow the blowing agent to cause the foam to grow in size. Steam for the expanders is generated by a 100 HP natural gas fired boiler (Donlee, Model No. 5PHV-100-NO94219). The boiler is categorically exempt from permitting pursuant to Rule 62-210.300(3)(a)33, F.A.C.

The VOC/HAP emissions are limited by pellet usages and VOC (as pentene) content in the pellets. The permit requires that the facility tests the EPS pellets for pentene prior to the permit renewal or provide the test results conducted by the pellet manufacturer(s).

Each expander can run 650-750 lb-EPS/hr. After the pellets are steam-heated, they need to be cured for 48 hours. There are currently 4 mesh nets to hold the first pass processed pellets for curing and 18 mesh nets for second and third passes (9 for each pass). However, facility can reconfigure the piping to operate a total of 7 first pass holding mesh nets, as

needed. Each net can hold a maximum of 1,000 lbs of ESP. This equates to a maximum daily capacity of 7,000 lbs of EPS processed and an annual maximum throughput of 2,555,000 lbs. However, the facility is requesting to keep the maximum throughput to the current permitted rate of 838,000 lbs, which equates to their current VOC PTE permit limit of 18 TPY.

E. Application Information:

Received on: August 25, 2014
Information Requested: N/A
Application Complete: August 25, 2014

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since this project does not result in a major modification.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since it is source of volatile organic compounds and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxides Reasonably Available Control Technology, F.A.C., since there is no applicable source category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology (RACT) - Lead, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology (RACT) – Particulate Matter, since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is no applicable source category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

Emission Unit	Actual VOC Emissions (TPY)	Potential VOC Emissions (TPY)
001 – Polystyrene Pellet Expanders	6.4	18

The VOC PTE was based on a throughput of 838,000 lbs/yr and a maximum of 4.3% of pentane (VOC) that is released during the expansion of the pellets.

Actual VOC emissions were based on data obtained from average of the 2010-2013 AORs.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

File No.: 0571205-007-AF
County: Hillsborough

Thomas G Eckel
Senior Vice President
Storopack, Inc.
4758 Devitt Drive
Cincinnati, Ohio 45246

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Storopack Inc., applied on August 25, 20141 to the EPC for an air permit for the installation of a fourth expander at their facility located at 4724 Transport Dr., Tampa FL, 33605.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-212. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and Rule 62-110.106(7)(a)1., F.A.C, you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days of receipt of

this Intent to Issue, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication, pursuant to Rule 62-110.106(5), F.A.C.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(9)&(11), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner

contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,

(c) Each rule or portion of a rule from which a variance or waiver is requested,

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,

(e) The type of action requested,

(f) The specific facts that would justify a variance or waiver for the petitioner,

(g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection (via email)
Kevin W. Golden, P.E. – UNIVERSAL Solutions, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an air pollution permit No. 0571205-007-AC to Storopack Inc. This construction permit authorizes the installation of a fourth expander. Emissions are controlled by limiting the material usage. The facility is a Synthetic Minor source located at 4724 Transport Dr., Tampa, FL 33605.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Thomas G Eckel
Senior Vice President
Storopack, Inc.
4758 Devitt Drive
Cincinnati, Ohio 45246

Re: Hillsborough County - AP

Dear Mr. Eckel:

Enclosed is Permit Number 0571205-007-AF for Storopack Inc. authorizing the installation of a fourth expander at a polystyrene bead expansion and molding facility, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/SN/sn

cc: Florida Department of Environmental Protection (via email)
Kevin W. Golden, P.E. - UNIVERSAL Solutions, Inc.

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:
Storopack Inc.
4724 Transport Dr.
Tampa, FL 33605

PERMIT/CERTIFICATION
Permit No.: 0571205-007-AF
County: Hillsborough
Expiration Date: 04/07/2019
Project: Addition of Vertical Expander

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, 62-297, and 62-4. The above named permittee 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 EPC and made a part of hereof and specifically described as follows:

For the installation of a fourth expander at an expandable polystyrene (EPS) expansion plant. The facility makes styrofoam peanuts for shipping packages. Pre-shaped EPS pellets are run through three Big Wally EPS expanders. The expanders use steam to heat the pellets to soften them and to allow the blowing agent to cause the foam to grow in size. Steam for the expanders is generated by a 100 HP natural gas fired boiler (Donlee, Model No. 5PHV-100-NO94219). The boiler is categorically exempt from permitting pursuant to Rule 62-210.300(3)(a)33, F.A.C.

Each expander can run 650-750 lb-EPS/hr. After the pellets are steam-heated, they need to be cured for 48 hours. There are currently 4 mesh nets to hold the first pass processed pellets for curing and 18 mesh nets for second and third passes (9 for each pass). However, the facility can reconfigure the piping to operate a total of 7 first pass holding mesh nets as needed. Each net can hold a maximum of 1,000 lbs of ESP, however, the annual EPS pellet production is limited to 838,000 lbs/year. The VOC/HAP emissions are limited by an annual material usage limit and the VOC (as pentene) content in the pellets.

Location: 4724 Transport Dr., Tampa, FL 33605

UTM: 17- 361.756 E 3093.428 N NEDS NO: 1205

Emission Unit No.: 001 - Polystyrene Pellet Expanders

Replacing Permit No.: 0571205-006-AF

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. In order to establish the facility as a synthetic minor for HAPs, as defined in Rule 62-210.200, F.A.C., HAP emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
[Rule 62-4.070(3), F.A.C. and Permit No. 0571205-001-AC]

5. To comply with the emission limit in Specific Condition No. 4, the following restrictions and limitations shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit Application Received on August 25, 2014]

A) Polystyrene Pellet Usage: 838,000 pounds.
B) Polystyrene Pellet Maximum VOC Content (measured as Pentane): 6.5 % VOC by weight for raw pellets.
C) The permittee will be given credit for 34% VOC remaining in the finished product.
D) The operating hours are not restricted.

6. Compliance with the emission limitations of Specific Condition No. 5. B) and C) shall be determined using California South Coast Air Quality Management District Method 306-91, Analysis of Pentanes in Expandable Styrene Polymers. One sample of the pellets from a box of raw beads and one sample from the finished product shall be taken and analyzed in accordance with Method 306-91. [Rule 62-4.070(3) F.A.C.]

7. Test the polystyrene pellets for pentane 180 days prior to renewal of this permit, and submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. In lieu of testing, the permittee can submit a test report on testing performed on the same pellet product or information provided by the manufacturer. Testing procedures shall be consistent with the requirements specified in Specific Condition 6.
[Rules 62-4.070(3) and 62-297, F.A.C.]

8. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

SPECIFIC CONDITIONS:

9. In order to demonstrate compliance with Specific Condition Nos. 4 and 5, records shall be kept for three (3) years and shall include the following: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

A) Date, Month, Year
B) Expandable Polystyrene Pellets Usage (Pounds)
C) Rolling twelve month total of B) above

10. Within 30 days of the installation of the new vertical expander, the permittee must submit to the Environmental Protection Commission of Hillsborough County a certification of completion. This certification shall provide the expander's date of installation and the manufacturer's information that includes the make and model number of the new expander.

11. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(2), F.A.C.]

12. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

13. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) The use of materials and fuels other than those authorized by this permit.
D) Using pellets with a pentane content greater than 6.5% by weight.

14. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

15. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the

SPECIFIC CONDITIONS:

expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director