

MEMORANDUM

DATE: October 20, 2014

TO: Richard D. Garrity, Ph.D.

FROM: Sahand Nasser, P.E. **THRU:** Diana M. Lee, P.E.

**SUBJECT: Final FESOP Permit – Storopack Inc
Permit No. 0571205-007-AF**

Attached is Final Permit No. 0571205-007-AF for a modification at Storopack Inc., an expandable polystyrene (EPS) expansion plant, located at 4724 Transport Dr., Tampa, FL 33605. This permit authorizes the installation of a fourth polystyrene expander. Also, the facility is requesting to remove the hourly limit on the expanders and change the method of calculating the PTE to better represent the process and emissions

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 facility published the Public Notice on October 3, 2014 in The Tampa Tribune. No comments were received from the facility or from the public.

Based on our review, we recommend issuance of this permit as drafted.

SN: 0571205-007-AF

FINAL DETERMINATION

FOR

Storopack, Inc.

Hillsborough County

Federally Enforceable State Operating Permit

Application Number

0571205-007-AF

Environmental Protection Commission of

Hillsborough County

Tampa, FL

October 21, 2014

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 26, 2014 that included an Intent to Issue Permit No. 0571205-007-AF to Storopack, Inc. The facility is located at 4724 Transport Dr., Tampa, FL, Hillsborough County, FL, 33605. This permit authorizes the installation of a fourth polystyrene expander. Also, the facility is requesting to remove the hourly limit on the expanders and change the method of calculating the PTE to better represent the process and emissions.

The Public Notice of Intent to Issue was published in The Tampa Tribune on October 3, 2014.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted.

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

Dear Mr. Eckel:

Enclosed is Permit Number 0571205-007-AF for the installation of a fourth expander, 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

Storopack, Inc.
Cincinnati, Ohio 45246

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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

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

PERMITTEE:
Storopak, Inc.

PERMIT/CERTIFICATION NO.: 0571205-007-AF
PROJECT: Addition of Vertical Expander

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.]
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.]

PERMITTEE:
Storopak, Inc.

PERMIT/CERTIFICATION NO.: 0571205-007-AF
PROJECT: Addition of Vertical Expander

SPECIFIC CONDITIONS:

- 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 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.]

PERMITTEE:
Storopak, Inc.

PERMIT/CERTIFICATION NO.: 0571205-007-AF
PROJECT: Addition of Vertical Expander

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director