FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

January 24,2014

FINAL PERMIT

PERMITTEE

ITW Polymers Adhesives, North America
11701 56th Court
Clearwater, FL, 33760

Authorized Representative:
Mr. Richard Hanisko, Operations Manager

Air Permit No. 1030501-009-AO
Permit Expires: 01/24/2019
ITW Polymers Adhesives, North America
Minor Air Operation Permit
Resin Production Facility

This is the final permit to renew Air Operation Permit No. 1030501-006-AO, as amended by Air Operation Permit No.1030501-008-AO for a resin formulation and mixing operation at the ITW Polymers Adhesives, North America facility (Standard Industrial Classification No. 2821). The facility is located in Pinellas County at 11701 56th Court in Clearwater, Florida. The UTM coordinates are Zone 17, 331.79 km East, and 3084.89 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution 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.

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 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within 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 Florida Administrative Code.

All petitions filed under these rules shall contain:

(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; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(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 agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency'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 agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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 of the Florida Administrative Code.

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

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 Hillsborough County, Florida

_____ 01/24/2014
Kelley M. Boatwright Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 the date indicated below to the persons listed below.

Richard Hanisko, ITW Polymers Adhesives, North America, (rhanisko@itwadhesives.com)

Gary Robbins, Pinellas County Air Quality Division (grobbins@co.pinellas.fl.us)

Sherrill Culliver, Pinellas County Air Quality Division (sculliver@co.pinellas.fl.us)

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.

_____ 01/24/2014

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility is primarily involved in the processing (mixing) of bulk resins, including styrene monomers and other formulation components such as promoters, into various styrene based products for use mainly by the fiberglass boat industry. The final products are largely filled resin and putty-like resin coatings stored and shipped in lined and unlined drums (55-gallons) or smaller containers (5-gallons).

The facility consists of one (1) main production building of approximately 15,000 square feet, two (2) 6,000 gallon polyester resin storage tanks and one (1) 6,000 gallon styrene monomer storage tank and one (1) maintenance service area.

Within the main production building are the following: 1. Raw materials storage area, 2. Five (5) partially enclosed mixing tanks of various sizes ranging from 1,000 to 3,500 gallons, 3. Promoters storage area, 4. Laboratory, 5. Final products storage area, and 6. Polyester resin storage area. The production building is equipped with several wall vents and/or fans that are utilized to capture and vent objectionable odors. In addition, the building is equipped with two (2) overhead rollup doors that may be closed, as necessary, to help control objectionable odors. All transfer and mixing of resins and related components occur within the main production building. Emissions of unconfined particulate matter from such activities vent inside the building.

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1030501

EU ID No.	Emissions Unit Description
001	Formulation of Resin Based Products

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC and HAPs. The emission limitations, restriction on the type or amount of material combusted, stored or processed in this permit will ensure that the facility's VOC and HAPs emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030501-006-AO. Also reference amended Operation Permit 1030501-008-AO.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

3. 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.

4. 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.

5. 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.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the

actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition No. A.5.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. General Standards: Unconfined Particulates: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the measures shown below.

a. Particulate matter emissions associated with the raw materials mixing activities (including raw material delivery via the conveyor and hose line systems) and abrasive grinding are to be controlled by good work practices and housekeeping procedures.

b. All mixing activities (including raw material delivery via the conveyor and hose line systems) and abrasive grinding are to be performed inside the main production building.

c. Reduced vehicular traffic speed.

d. Roadways and parking areas paved to the extent practicable.

e. If not already enclosed, trucks, trailers, front-end loaders, and other vehicles or containers will be covered to prevent release of PM during transport.

f. Use of mulch, seeding, grassing, and/or other vegetative cover on barren areas to prevent or reduce windblown PM from unpaved areas.

g. Application of water or chemicals used to control PM from activities such as demolition of buildings or construction.

[Rules 62-296.320(4)(c), F.A.C.; Construction Permit 1030501-001-AC, Permit Application Received 01-10-2014]

10. Fugitive Emissions Opacity Standard: As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. 8 are adequate, emissions of unconfined particulate matter from the main production building should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices beyond those of Specific Condition No. 9 may be necessary.
[Construction Permit 1030501-001-AC]

11. General Standards: Objectionable Odor**:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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.

(Permitting Note: If the Department or the Pinellas County Air Quality Division (PCAQD) receives a valid odor complaint, the Department or PCAQD reserves the right to require that additional odor control measures/work practices be implemented. These measures or practices may, for example, require that building doors (including overhead rollup doors) and windows be closed when conducting any mixing and related operations in order to ensure the emissions are captured and discharged with adequate dispersion.)

[Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

A. EU No. 001 Formulation of Resin Based Product

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	*Formulation of Resin Based Products* – This emissions unit consists of the mixing of resin and related components for use by the fiberglass boat building industry. The main production building consists of: 1. Raw materials storage area, 2. Five (5) partially enclosed mixing tanks of various sizes ranging from 1,000 to 3,500 gallons, 3. Promoters' storage area, 4. Laboratory, 5. Final products storage area and 6. Polyester resin storage area. The production building is equipped with several wall vents and/or fans that are utilized to capture and vent objectionable odors. In addition, the building is equipped with two (2) overhead rollup doors that may be closed, as necessary, to help control objectionable odors. All transfer and mixing of resins and related components occur within the main production building. Emissions of unconfined particulate matter from such activities vent inside the building. In addition, there are two (2) 6,000 gallon styrene polyester resin storage tanks and one (1) 6,000 gallon styrene monomer storage tank outside the building.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.; Construction Permit 1030501-001-AC]

A.2. Organic Solvents and Volatile Organic Compounds: The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, OS, or VOC without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be used to minimize pollutant emissions.

a. Maintain tightly fitting cover, lids, etc. on all containers of OS/VOC/HAPs when they are not being handled, tapped, etc.

b. All VOC/HAPs fittings, valve lines, etc. shall be properly maintained.

c. All VOC/HAPs spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

d. All solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere.

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

EMISSIONS STANDARDS

A.3. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations: Emissions of VOC, Total HAPs and any individual HAP from EU No. 001 shall not exceed the following:

Pollutant	Emission Limitation*
VOC	99.0 tons per any consecutive 12 month period
Any Individual HAP	9.0 tons per any consecutive 12 month period
Total HAPs	24.0 tons per any consecutive 12 month period

**Based on these emission limitations additional emission units/activities at the facility may not be eligible to utilize the Categorical Exemptions in Rule 62-201.300(3)(a), F.A.C. or the Generic and Temporary Exemptions in Rule 62-210.300(3)(b), F.A.C.*

[Rule 62-210.200 F.A.C. ("Potential to Emit"); Requested by applicant in permit application dated February 17, 2012]

A.4. Emission Methodology**:** The permittee shall calculate emissions from the emission unit based on the following methodology:

a. Material Usage Rate ***x*** Species Concentration ***x*** .02% = Species Emission Rate for all VOC and non-styrene HAP containing materials.

b. Material Usage Rate ***x*** Species Concentration ***x*** 1.56% = Species Emission Rate for all styrene containing materials.

[Rules 62-4.070(3) and 62-210.200, F.A.C. ("Potential to Emit")]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.5. VOC and HAPs Recordkeeping: The permittee shall maintain a monthly log tracking the usage and associated emissions of HAPs and VOC containing materials used in the manufacturing process. At a minimum, the logs shall contain the following:

a. Facility Name, Facility Number (1030501), Emission Unit ID No. (001) Formulation of Resin Based Product, Month, Year.

b. For each type of raw material (resin, coating, solvent, chemical, etc.) used at the facility that contains HAPs and/or VOC, record the following:
   1. The type of raw material (e.g., resin) and material identification or description;
   2. The quantity (in pounds or tons) of materials used (where usage may be determined based upon the beginning and ending inventory and receipt of materials);
   3. The HAP and VOC content.

c. Emissions:
   1. The total quantity (in tons) of each individual HAP and total HAPs emissions for the month;
   2. The total quantity (in tons) of VOC emissions for the month;
   3. The total quantity (in tons) of each individual HAP and total HAPs emissions for the most recent consecutive 12 month period;
   4. The total quantity of (in tons) of VOC emissions for the most recent consecutive 12 month period.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

A.6. Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition No. A.5., which includes sufficient information to determine VOC and HAP emissions, shall also be kept. At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no materials are used which are not purchased.
[Construction Permit 1030501-001-AC]

A.7. Daily Records - If any month results in total VOC, total HAPs, and/or any individual HAP emissions exceeding 90% of the permitted limits (i.e., 89.1 tons of total of VOC, 21.6 tons of total HAPs, and 8.1 tons of individual HAPs) for the most recent consecutive 12-month period, the facility shall keep daily records beginning on the next operational day following when the monthly calculation was completed. These daily records shall be added daily to demonstrate cumulative 12-month emission totals are in compliance with the emission limitations of Specific Condition No. A.3.

Once a month of daily records is completed, the facility shall make a determination to continue daily recordkeeping. If emission totals exceed 90% of any emission limit listed in this permit, then daily record keeping shall continue. If all the emission totals do not exceed 90% of the permitted values, then the facility may return to monthly recordkeeping. The option of using purchases as a proxy for usage (see Specific Condition No. A.6.) is not allowed for this daily recordkeeping.
[Construction Permit 1030501-001-AC]

A.8. Records Completion and Retention - Daily records (if required) shall be completed within three (3) business days. Monthly records shall be completed by the end of the following month. The records shall be recorded in a permanent form suitable for inspection by the Department and PCAQD upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]