FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
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LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

DRAFT PERMITS

PERMITTEE

Modern Silicone Technologies, Inc.
10601 U.S. Highway 19 North
Pinellas Park, FL 33782

Authorized Representative:
Mr. Matt Algate, Plant Manager

Air Permit Nos. 1030563-001-AC &
1030563-002-AO
Permit Expires: 06/01/2015 (AC)
xx/xx/20xx (AO)
Pinellas Park Facility
Minor Air Construction/Operation Permit
Project: Combined Construction and Operation Permit for Plastic Molding Facility

These are the final air construction and operation permits, in one document, which authorizes the after-the-fact construction and operation of a plastic injection molding facility. The work is conducted at the Modern Silicone Technologies, Inc., Pinellas Park Facility (Standard Industrial Classification No. 3053). The facility is located in Pinellas County at 10601 U.S. Highway 19 North in Pinellas Park, Florida. The UTM coordinates are Zone 17, 332.36 km East, and 3083.89 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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.

These air pollution permits are 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 these permits. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Kelley M. Boatwright
Permitting & Waste Cleanup
Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Draft Permits 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.

Mr. Matt Algate, Plant Manager, Modern Silicone Technologies, Inc. (malgate@modernsilicone.com)

Mr. Timothy E. Denhof, P.E., Vanguard Environmental, Inc., (tdenhof@vanguardenvl.com)

Mr. Sherrill Culliver, Pinellas County Air Quality Division, (sculliver@pinellascounty.org)

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.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a plastic injection molding facility that produces that produces a variety of custom-design gaskets.

Facility ID No. 1030563	
EU ID No.	**Emissions Unit Description**
001	Plastic Injection Molding Operation (Priming Process and Mold Cleaning)

Project Description and Affected/Proposed Emission Units

This project is for the after-the-fact construction and operation of an existing plastic injection molding operation.

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

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 HAP.

PERMIT HISTORY/AFFECTED PERMITS

The facility had previous after-the-fact construction and operation permits (1030536-001-AC and 1030536-002-AO) for the facility when it was located in Clearwater. The facility has now moved to a new location in Pinellas Park. No previous permits exist for the new facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or 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. 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.
[Rules 62-296.320(2) and 62-210.200 (Definitions), F.A.C.; Pinellas County Code, Section 58-178]

8. 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.]

9. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to local program name (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.;

c. copies of the most recent two months of records specified in Specific Condition No. A.4.

[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.]

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

EU ID No.	Emissions Unit Description
001	*Plastic Injection Molding Operation (Priming Process and Mold Cleaning) -* The facility utilizes silicone, polypropylene and nylon based resins in a molding process that is not considered to be a source of air emissions. Operation activities also include a "priming" process and mold cleaning which are considered to be sources of air emissions. The "priming" process utilizes a mixture of petroleum distillate compounds for the purpose of coating nylon-based gaskets. Coating is accomplished by dipping the gaskets in the distillate compound. The facility currently performs coating activities outdoors using open containers and by hand dipping gaskets. Coated materials are air-dried on a table and free liquid is collected in a drip pan and returned to product drums. Vapors released are fugitive and are sources of VOC and HAP emissions. Mold cleaning activities, which involve the use of solutions that contain chlorinated solvents and alcohols to clean molds between uses, are a source of VOC and HAP emissions.

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.]

EMISSIONS STANDARDS

A.2. VOC Emissions Limitations – VOC emissions from this emissions unit shall not exceed 44.3 tons per any consecutive 12-month period.
[Air Construction Permit Application dated 10/24/2014; Rule 62-4.070(3) and 62-210.200 (PTE), F.A.C]

A.3. Total HAP Emissions Limitations – Total HAP emissions from this emissions unit shall not exceed 3.0 tons per any consecutive 12-month period.
[Air Construction Permit Application dated 10/24/2014; Rule 62-4.070(3) and 62-210.200 (PTE), F.A.C]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.4. VOC and HAP Monthly Log – The permittee shall maintain appropriate records to document compliance with the VOC and HAP emission limits of Specific Condition Nos. A.2. and A.3. The records shall include, but are not limited to, the following:

a. Facility Name, Facility Number (1030563), Emission Unit No. (EU-001), Month, Year.

b. For each raw material (priming solution, cleaning solvent, etc.) used that contains a VOC and/or HAP, record the following:

1. raw material identification/description;

2. raw material density;
3. total quantity of each raw material used for month (in gallons or pounds);
4. concentration (e.g., percent) of VOC and HAP components in each raw material;
5. calculate the VOC and total HAP emissions for the month (in tons) for each raw material;

c. Calculate the VOC and total HAP emissions for the most recent month (in tons) for all raw materials.

d. Calculate the VOC and total HAP emissions for the most recent consecutive 12-month period (in tons) for all raw materials.

Supporting documentation (MSDS sheets, "As Supplied" sheets, purchase orders, purchase records, inventory records, production records, etc.), which includes sufficient information to determine emissions and natural gas usage shall also be kept. The monthly records shall be completed by the end of the following month. These records along with the supporting documentation shall be recorded in a permanent form suitable for inspection by the Department and the Pinellas County Air Quality Division upon request and maintained at the facility for at least three years.

[Rule 62-4.070(3), F.A.C.]