Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Momentive Specialty Chemicals Inc.
2525 S. Combee Road
Lakeland, FL 33801

Authorized Representative:
Mr. Ronald Kunsa, Site Manager

Air Permit No. 1050100-013-AF
Permit Expires: xx/xx/2016
Site Name : Lakeland Plant
Federally Enforceable State Operating Permit (FESOP)
Project Name: Operation Permit Renewal

This is the final air operation permit, to renew FESOP No. 1050100-011-AF, incorporate the applicable terms and conditions of Construction Permit No. 1050100-010-AC, and incorporate an Alternate Sampling Procedure for a polymer and resin manufacturing facility. The operations are conducted at the Lakeland Plant (Standard Industrial Classification No. 2821). The facility is located in Polk County at 2525 S. Combee Road in Lakeland, Florida. The UTM coordinates are Zone 17, 410.63 km East, and 3098.18 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

Because of 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. 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 this final permit, 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

_____ _____

Robert C. Wong 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 Determination, 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 _____ to the persons listed below.

Mr. Ronald Kunsa, Site Manager
Momentive Specialty Chemicals, Inc.
ronald.kunsa@momentive.com

Mr. David Herring, Regional Environmental Manager
Momentive Specialty Chemicals, Inc.
david.herring@momentive.com

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

The facility currently produces product categories such as polyester, polyamides, blocked isocyanates, and fatty acid/amines. The facility consists of raw material storage facilities, process equipment, and load out facilities. Liquid raw materials are held in storage tanks, totes, drums, and pails. The small packaged liquids and the solid raw materials are warehoused. The production phase of the operation consists primarily of batch chemical reactions.

The existing facility consists of the following emission units:

Facility ID No. 1050100	
ID No.	Emission Unit Description
005	Controlled Emissions from Polymer and Resin Production
009	Fugitive VOC/HAP Emissions

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

Project Description

This permit is to renew Air Operation Permit No. 1050100-011-AF, incorporate some of the modifications addressed in Air Construction Permit No. 1050100-010-AC, and incorporate an Alternate Sampling Procedure for a synthetic non-Title V polymer and resin manufacturing facility. Additionally, the project:

- Changes the testing frequency of the emission control device (thermal oxidizer) from an annual basis to prior to permit renewal.
- Deletes the emission testing requirements for the temporary use backup emission control device (Carbon Control System).
- Adds a requirement for the Carbon Control System to change its carbon canisters at least annually and no more than 15 months apart.
- Deletes a 50 lbs./hr. maximum volatile organic compound (VOC) input rate limitation to the emission control devices.
- Removes the maximum daily total production rate limitation.
- Deletes the maximum VOC emission limitation of 2.27 lbs./hr.
- Adds new recordkeeping requirements to document emissions based on each product produced and its associated emission factor.

The facility's maximum allowable emissions are not changing as a result of this project.

Exempt Emission Units/Activities

- Eclipse Liquid Phase Heater No. 3 with a maximum heat input rate of 8.3 MMBTU/hr. and physically only fired with natural gas. (Previously was Emission Unit No. 006)
  [Rule 62-210.300(3)(a)34., F.A.C.]

- Heatec Oil Heater No. 4 that uses a liquid heat transfer medium in a closed loop. The hot liquid from the heater is circulated into reactors to maintain them at the desired temperature. The closed loop then returns the liquid to the heater. Only natural gas is fired in the heater at a total maximum heat input rate of 10.58 MMBTU/hr. The heater was constructed after June 9, 1989 and is rated at 9.995 MMBTU/hr., which is considered equivalent to 10 MMBTU/hr., thus establishing the heater subject to Title 40 Code of Federal Regulations (CFR), Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The heater has a pre-heater that is also fired with only natural gas at a maximum heat input rate of 583,000 BTU/hr. This federal regulation only requires the heater/pre-heater to monthly record the fuel type and amount of fuel used per 40 CFR 60.48c(g). Since this federal requirement is not considered a "unit-specific applicable requirement" as defined in Rule 62-210.200, F.A.C., the heater/pre-heater meets the criteria for this exemption. (Previously was Emission Unit No. 008)
  [Rule 62-210.300(3)(a)34., F.A.C.]

- Miura, Model LX-150, boiler (north), with a maximum heat input rate of 6.17 MMBTU/hr.
  [Rule 62-210.300(3)(a)34., F.A.C.]

- Miura, Model LX-150, boiler (south), with a maximum heat input rate of 6.17 MMBTU/hr.
  [Rule 62-210.300(3)(a)34., F.A.C.]

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 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 pollutant(s) volatile organic compounds (VOCs), individual hazardous air pollutants (HAPs), and total hazardous air pollutants (THAPs).

PERMIT HISTORY/AFFECTED PERMITS

- Replaces and Renews Permit No. 1050100-011-AF.

- Incorporate terms and conditions of Construction Permit No. 1050100-010-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

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

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   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 the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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. Volatile Organic Compounds/Organic Solvents Work Practice Requirements: All equipment, pipes, hoses, lids, fittings, etc. shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing volatile organic compounds (VOCs) and/or organic solvents.
[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1050100-010-AC]

8. Unconfined Particulate Matter Work Practice Requirements: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. This condition applies 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. At a minimum the following reasonable precautions shall be implemented:

   a. Watering of plant grounds as necessary.
   b. Confining of abrasive blasting where possible.
   c. Unconfined particulate matter emissions during the loading of Reactors #2 and #9 are each controlled by their own Young Industries, Inc. Model FBD 42-8 baghouse. As an indicator the two (2) baghouses associated with Reactor #2 and #9 are operating properly, the Department has determined there should be no visible emissions (5% opacity) from each device. Visible emissions in excess of 5% is not considered a violation in and of itself, but an indicator of improper operation and may indicate a violation of Rule 62-210.650, F.A.C.

   [Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1050100-010-AC]

9. 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.]

10. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the 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 compliance test reports required by Specific Condition No. A.10., if not previously submitted; and
   d. at least one recent month of records as required by Specific Condition Nos. A.11., B.3. and C.3.

   [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.]

A. EU No. 005 – Controlled Emissions from Polymer and Resin Production

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
005	Polymer and resin production involves movement of materials from storage tanks to reactor vessels Nos. 1, 2, 3, 4, 6, 7, and 9 where chemical reactions take place. Products are then pumped to delivery trucks, totes, drums, etc. Emissions of volatile organic compounds/organic chemicals (VOC/OC) and hazardous air pollutants (HAPs) from 41 storage tanks, 7 reactors, and 12 product loadout activities are routed to and controlled by an existing CJS Energy Resources, Inc. thermal oxidizerr. The thermal oxidizer is only fired with natural gas at a maximum design heat input rate of 1.5 MMBTU/hr. A Calgon Carbon Corporation carbon control system (CCS), which uses 2 carbon canisters simultaneously in parallel, is used as a back-up control device to the thermal oxidizer. The total loading of the 2 inlets to the thermal oxidizer combined is not expected to exceed 50 lbs./hr. of VOCs, measured as carbon. The loading to the 1 inlet to the CCS is not expected to exceed 50 lbs./hr. of VOCs, measured as carbon. All tanks and reactors are blanketed with nitrogen except tanks containing ethylamines. *Note, fugitive emissions from the Polymer and Resin Production are accounted for in Emission Unit No. 009.*

PERFORMANCE RESTRICTIONS

A.1. Operating Limitations: The permittee shall comply with the following:

a. The back-up carbon control system (CCS) is allowed to operate a maximum of 480 continuous hours and a total maximum of 960 hours per calendar year.

b. The facility shall replace the carbon canisters in the CCS with new carbon canisters annually and no more than 15 months from the last canister replacement.

c. The minimum VOC destruction efficiency of the thermal oxidizer shall be 95.46%.

NOTE: Based on historical compliance emission testing results, the CCS's minimum VOC destruction efficiency is considered 95.46% and regularly scheduled compliance emission testing to demonstrate emissions or destruction efficiency is not required.

d. The thermal oxidizer shall be only fired with natural gas.

e. Automatic controls shall be provided to ensure:

1. If the thermal oxidizer is not able to maintain a minimum temperature of 1350 °F, the bypass valve will open.

2. If the incoming VOC concentration to the thermal oxidizer exceeds 10% LEL, fresh air is introduced to prevent the LEL from exceeding 40%, which would cause the thermal oxidizer bypass valve to open.
3. If the bypass valve is opened, emissions from the VOC emitting operations shall be diverted to the CCS. NOTE – The CCS shall be maintained in proper working order and capable of efficient operation when VOC emissions are being diverted to the system.

g. Store only ortho cresol in Tank 26, which then transfers the material to only Reactor No. 2.

h. Store only xylene in Tank 82, which then transfers the material to Weigh Vessel V-0110 and other locations.

i. Store only butanol in Tank 87, which then transfers the material to Weigh Vessel V-0110 and other locations.

j. Store only Jeffamine D-230 in Tank 25, which then transfers the material to only Reactors 1, 3, and 6.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

EMISSIONS STANDARDS

A.2. Controlled VOC Emission Limitations: The combined VOC emissions from the thermal oxidizer and CCS shall not exceed 7.00 tons per any consecutive 12-month period.*

* Compliance with this value shall be determined by using: 1) the thermal oxidizer's VOC destruction efficiency from the most recent stack test when the thermal oxidizer is used; 2) the CCS's VOC destruction efficiency of 95.46% when the CCS is used; and 3) the VOC input of the materials/products processed. The results shall also be used in the required Annual Operating Report.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

A.3. Visible Emission Limitation: Visible emissions from the thermal oxidizer and CCS shall not be equal to or exceed 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

A.4. Circumvention Limitation: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. As an indicator the thermal oxidizer and CCS are operating properly, the Department has determined there should be no visible emissions (5% opacity) from each device. Visible emissions in excess of 5% is not considered a violation in and of itself, but an indicator of improper operation and may indicate a violation of Rule 62-210.650, F.A.C.
[Rule 62-210.650, F.A.C.; Construction Permit No. 1050100-010-AC]

TESTING REQUIREMENTS

A.5. Emission Testing Requirements: The thermal oxidizer shall be tested at least 105 days prior to and no more than 365 days prior to the expiration date of this permit for the following parameters:

a. VOC (inlet(s) and outlet) emissions in lbs./hr.
b. Visible emissions
c. Airflow (actual cubic feet per minute)
d. Airflow (ft./sec.)
e. Residence Time
f. VOC destruction efficiency (%)

[Rules 62-297.310(7) and 62-297.310(8), F.A.C.; Construction Permit No. 1050100-010-AC]

A.6. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.7. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
1, (1A, 2A, and 2D, as appropriate), 3, and 4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content *{per ASP File No. 12-C-AP regarding Methods 1A, 2A, and 2D, as appropriate}*
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25 (25A)	Determination of Total Gaseous Nonmethane Organic Emissions As Carbon. (If the outlet concentration is less than 50 ppmv as carbon, use 25A – Determination of Total Gaseous Organic Concentration Using A Flame Ionization Analyzer)

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department. The permittee shall comply with the Order On Request For Alternate Procedures and Requirements, ASP File No. 12-C-AP dated February 7, 2012, that orders:

a. Petitioner may use a standard Pitot tube, a single sampling port and take one velocity reading per run to determine flow in the small diameter ducts.

b. EPA Test Methods 1A, 2A, and 2D, as appropriate, should be added to the test methods identified in Specific Condition B.5. "Emission Test Method Requirements" of Air Construction Permit 1050100-010-AC. *{see Table above}*

c. Three inch diameter sampling ports are not required to conduct the compliance tests required by Air Construction Permit 1050100-010-AC.

d. This Order shall not abrogate the Petitioner's obligation to comply with any periodic monitoring requirements established pursuant to the provisions of the Federal Clean Air Act (42 USC 1857, et seq) as amended in 1990.

e. The Petitioner shall incorporate this order into the permit at the next opening for revision or renewal. The approved alternate procedure must be identified in the public notice for the permitting action.

f. If an application to incorporate this order into the permit at the next opening for revision or renewal is not made, this order shall expire on February 1, 2017.

g. When incorporated into the permit, this order shall remain in effect until the underlying rule requirement for this order is modified or changed. At that time the Petitioner shall submit a new request, if required, in accordance with Rule 62-297.620, F.A.C., "Exceptions and Approval of Alternate Procedures and Requirements," to the Office of Permitting and Compliance. *{mailing address is: Department of Environmental Protection, Division of Air Resource Management, Office of Permitting and Compliance, Bob Martinez Center, 2600 Blair Stone Road, Tallahassee, FL 32399-2400}*

[Rules 62-204.800, 62-297.100, and 62-297.620, F.A.C.; and Appendix A of 40 CFR 60; Construction Permit No. 1050100-010-AC]

A.8. Additional Operating Requirements During Testing: Testing of the thermal oxidizer and CCS (if requested) shall be conducted in accordance with the following testing protocol:

a. If a batch time is greater than 24 hours, then the total amount of product produced per batch will be assumed to occur within the 24 hour period.

b. A production day shall be from midnight to midnight. Batches completed (Final Product) within that period of time will be counted in that day's production. (Also see a. above)

c. Testing of emissions shall be conducted during normal and typical operational conditions that represent recent production activities.

d. If the Department deems the operating conditions during the test period did not represent normal and typical operational conditions a new compliance test(s) may be required.

[Rule 62-297.310(2), F.A.C.; Construction Permit No. 1050100-010-AC]

NOTIFICATION REQUIREMENTS

A.9 Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

REPORTS AND RECORDS

A.10. 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. The test reports shall be submitted to the Compliance Authority within 45 days of testing. Failure to submit the following with the test reports may invalidate the tests and fail to provide reasonable assurance of compliance:

a. An explanation of how the operating conditions during the test met each of the requirements of Specific Condition No. A.8.c.

b. Name of product(s) produced.

c. Results of the parameters listed in Specific Condition No. A.5.

d. Quantity of natural gas used in the thermal oxidizer in cubic feet along with the equivalent average hourly MMBTU/hr. heat input rate during the test period.

e. A statement of which loadout activities were operating during the test period.

[Rule 62-297.310(8), F.A.C.]

A.11. Recordkeeping Requirements: The permittee shall keep the following records/logs:

a. A monthly log of all thermal oxidizer shut downs, which includes the following:

1. Number of shut downs.
2. Length of shut downs in days.
3. Cause of each shut down.

b. For each day the thermal oxidizer is operating, record the operating temperature during a period when it is functioning as an emission control device to ensure the minimum temperature of 1350 °F is being maintained.

c. When the CCS is operating, record daily the total continuous hours of operation since activation as a backup device and the total cumulative hours of operation for the calendar year.

d. Monthly record the most recent consecutive 12-month period total of non-fugitive VOC, individual HAP, and total HAPs emissions to ensure compliance with Specific Condition Nos. A.2. and C.2. These values shall be derived by documenting each product produced, the appropriate emission factors associated with each product produced, the thermal oxidizer's most recent tested VOC destruction efficiency, and the CCS's minimum VOC destruction efficiency of 95.46% when the CCS is used.

Monthly logs/records shall be completed by the end of the following month and daily records/logs shall be completed within 3 business days. These records shall be kept at the facility for at least 3 years and shall be available for inspection by the Department.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050100-010-AC]

B. EU No. 009 – Fugitive VOC/HAP Emissions

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
009	Fugitive VOC/HAP emissions, including the fugitive emissions from the polymer and resin production, released as leakage from an estimated 4,400 agitators, blowers, pumps, flanged pipe couplings, valves, connectors, and open-ended lines. Control of these emissions is attained by routine leak-checks and repair of problem systems. Also included in this emission unit are fugitive VOC/HAP emissions from: Wastewater Plant & Trenches — Hot Oil Expansion Tank Maintenance Painting — Parts Cleaning/Maintenance Vehicle Refueling — Biotreater Marley Cooling — Clay Waste Handling

PERFORMANCE RESTRICTIONS

B.1. Operating Limitations: In order to avoid the requirements of 40 CFR 63, Subpart T – Halogenated Solvent Cleaning, parts cleaning shall not use any solvent containing methylene chloride (CAS No.75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

EMISSION STANDARDS

B.2. Fugitive VOC Emission Limitation: Fugitive VOC emissions from this emission unit shall not exceed 78.72 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

RECORDS

B.3. Emission Calculations: Monthly, separately estimate the most recent consecutive 12-month period total of fugitive emissions of VOCs, individual HAP, and total HAPs**.** Emission estimates shall be determined by application of the Synthetic Organic Chemical Manufacturing Industry (SOCMI) average emission factors to pipe flanges and open-ended lines. Estimated emissions from valves, pumps, agitators, blowers, and vacuum pumps shall be determined using SOCMI "leak/no-leak" emission factors. Procedures for estimates shall be as described in EPA's Protocol for Equipment Leak Emission Estimates. Emissions from the following activities shall be determined by AP-42 or equivalent factor:

Wastewater Plant & Trenches — Hot Oil Expansion Tank

Maintenance Painting	Parts Cleaning/Maintenance
Vehicle Refueling	Biotreater
Marley Cooling Tower	Clay Waste Handling

Monthly records shall be completed by the end of the following month. These records shall be kept at the facility for at least 3 years and shall be available for inspection by the Department. [Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

C. Common Conditions for EU Nos. 005 and 009

PERFORMANCE RESTRICTONS

C.1. Hours of Operation: Each emission unit is allowed to operate continuously (i.e., 8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

EMISSION STANDARDS

C.2. HAP Emission and Recordkeeping Limitations: The emission units combined shall not emit more than:

a. 9.9 tons of any individual HAP per any consecutive 12-month period; and

b. 21.4 tons of total HAPs in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]

RECORDS

C.3. HAP Emission Calculations: In order to document compliance with each of the emission limitations in Specific Condition Nos. C.2.a. and C.2.b., the permittee shall monthly record the combined monthly individual HAPs and total HAPs results separately from Specific Condition Nos. A.11.d. and B.3. The monthly logs/records shall be completed by the end of the following month. These records shall be kept at the facility for at least 3 years and shall be available for inspection by the Department.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050100-010-AC]