TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Imperial Foam & Insulation Manufacturing Company
2360 Old Tomoka Road
Ormond Beach, FL 32174

Imperial Foam & Insulation Manufacturing

Facility ID No. 1270090

PROJECT

Project No. 1270090-006-AV
Application for Title V Air Operation Permit Renewal
Project Name: Title V Air Operation Permit Renewal
COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 9, 2012

Prepared by Jeffrey Rustin, P.E.

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. <u>Project Description:</u>

A. Applicant:

Mr. Harry Merryday, Vice/President/General Manager
Imperial Foam & Insulation Manufacturing Company, Inc.
2360 Old Tomoka Road
Ormond Beach, FL 32174

B. Professional Engineer:

Ms. Veronica N. Sgro, P.E., Senior Engineer
Koogler and Associates, Inc.
4014 N.W. 13th Street
Gainesville, Florida 32609

C. Project Location:

Imperial Foam & Insulation Manufacturing Company, Inc.
2360 Old Tomoka Road
Ormond Beach, FL 32174

D. Project Summary:

The purpose of this permit is to renew the existing Title V air operation permit 1270090-004-AV.

E. Application Information:

Application Received on: 10/19/11
Additional Information Requested on: 12/18/11
Additional Information Received on: 2/20/12
Application Complete: 2/20/12

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	A source of VOC.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is considered to be a Title V source.

IV. Summary of Emissions

Pollutant	EU No.	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
VOC	EU 001	245.0	**245.0**

The facility currently emits no HAPs.

V. Federal NSPS and/or NESHAP Provisions

No NSPS/NESHAP Regulations apply.

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C. The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, 407-893-3334.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit for the aforementioned air pollution sources in accordance with the draft permit and its conditions as stipulated (see attached).