Title V Air Operation Permit Renewal
Permit No. 1270090-006-AV

APPLICANT

The applicant for this project is Imperial Foam & Insulation Manufacturing Company, Inc. The applicant's responsible official and mailing address are:

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

FACILITY DESCRIPTION

The applicant operates Imperial Foam & Insulation Manufacturing, which is located at 2360 Old Tomoka Road, Ormond Beach, Florida.

The facility manufactures polystyrene foam and insulation products. The process consists of unexpanded polystyrene beads that are deposited into a weigh hopper and the measured quantity of unexpanded beads is then introduced into the expansion chamber. Typically, one type of polystyrene bead is expanded per batch.

Steam from two (2) onsite boilers (rated at 2.5 and 6.7 MMBtu/hr and burns No. 2 fuel oil) is introduced into the expansion chamber to expand the beads. A sensor in the expansion chamber determines when the beads are fully expanded. The expanded beads are emptied from the expansion chamber to the dryer. Dried expanded beads overflow over a gate and are mixed and separated by an impeller in order to prevent the dried expanded beads from clumping. The beads then fall through a grate and are deposited into a storage area where they are aged for at least 4 to 24 hours.

Aged expanded beads are then deposited into a mold where steam is applied to make the beads adhere to each other. Typically, only one type of expanded bead is used to produce each polystyrene log. Next, a vacuum is applied to the mold to eliminate moisture, cool the beads, and shrink the product. After the molding operation is complete, the polystyrene log is then released from the mold, put into storage, and cured for three (3) days in order to achieve product stability.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **June 18, 2007**
Application for a Title V Air Operation Permit Renewal received **October 19, 2011**
Additional Information Request dated **December 16, 2011**
Additional Information Response received **February 20, 2012**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility **is not** identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

Changes as part of this renewal include:

1) **Updating of facility and process description;**

2) **Removal of Specific Condition No. A.6., The Second Expander. This unit is covered under Construction Permits no. 1270090-003-AC and 005-AC. Modification Permit no. 1270090-005-AC authorizes extension of Construction Permit No. 1270090-003-AC to expire on December 31, 2013. The plant has not started the expansion project. Construction for the new building and second expander has not commenced; and**

3) **Change in Subsection C. Applicable Regulations. This facility currently is not a major source of HAPs.**

CONCLUSION

This project renews Title V Air Operation Permit No. 1270090-004-AV, which was issued on June 18, 2007. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.