PERMITTEE:
Johns Manville
5510 West 12th Street
Jacksonville, FL 32254-1653

DRAFT Permit Number: 0310334-008-AC
Permit Type: Non-Title V Air Construction Permit
Facility Name: Johns Manville – Jacksonville Operations
SIC Number: 3086

Authorized Representative: Steve Allaire, Plant Manager

Project and Location
This permit authorizes the construction of one polyurethane rigid foam insulation board laminator with two natural gas fired burners. The facility is located in Duval County at 5510 West 12th Street, Jacksonville, Florida 32254-1653. The UTM coordinates are Zone 17, 428.43 km East, and 3357.59 km North. The latitude and longitude coordinates are 30˚20'55" North, 81˚44'28" West.

Statement of Basis
This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, Florida Administrative Code (F.A.C.), and applicable Rules of the Jacksonville Environmental Protection Board (JEPB). The permittee is authorized to perform the work at the facility as described in the permit application, approved drawings, plans, and other documents attached hereto or on file with the City of Jacksonville, Environmental and Compliance Department, Environmental Quality Division (Permitting Authority), and in accordance with the terms and conditions of this permit.

Expiration Date: December 31, 2013
Operation Permit Application Due Date: September 30, 2013

Environmental and Compliance Department
Environmental Quality Division

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Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/CBJ

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Section I. Facility Information

Subsection A. Facility/Project Description

The purpose of this project is the installation of one (1) 95,000 board feet per hour (832.2 million board feet per year) laminator [Emission Unit (EU) 003] with two (2) 0.478 million British thermal units per hour, natural gas fired, burners.

This project also includes the removal of one (1) 83,300 board feet per hour (370.0 Million board feet per year) laminator (EU 002) with one (1) 2.0 Million British thermal units per hour, natural gas fired, burner.

The facility operates a foam insulation board manufacturing process. Operations at the facility include unloading and storage of Methylene Bis Diphenylmethanediisocyanate (MDI), polyol, and pentane; material blending; panel production and cutting; and product storage.

Pentane, used as a blowing agent, is stored in a 30,000-gallon tank. The tank will be maintained under pressure and vented back to the supply tanker during loading.

Ventilation hoods are installed on the board laminator. Volatile Organic Compound (VOC) emissions are collected by the ventilation hoods and exhausted to the atmosphere.

The facility is a synthetic Non-Title V source of air pollution because the operational limit assumed by the owner will limit the potential emissions of any regulated air pollutant to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Chapter 62-210, FAC, and Rule 2.301, JEPB.

Subsection B. Summary of Emission Unit (EU) ID Numbers and Brief Descriptions

EU No.	EU Description	Control Device
003	Insulation Panel Manufacturing	None

Subsection C. Relevant documents

Permit Number: 0310334-007-AO
Air construction permit application received October 10, 2011

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Permitting Authority will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Permitting Authority.

3. As provided in subsections 403.987(6) and 403.722(5), F.S, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Permitting Authority permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Permitting Authority rules, unless specifically authorized by an order from the Permitting Authority.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Permitting Authority rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Permitting Authority rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Permitting Authority with the following information:
   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Permitting Authority for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Permitting Authority rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Permitting Authority.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:
    a. Upon request, the permittee shall furnish all records and plans required under Permitting Authority rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Permitting Authority.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Permitting Authority rule.
    c. Records of monitoring information shall include:
        i The date, exact place, and time of sampling or measurements;
        ii The person responsible for performing the sampling or measurements;
        iii The dates analyses were performed;
        iv The person responsible for performing the analyses;
        v The analytical techniques or methods used;
        vi The results of such analyses.

15. When requested by the Permitting Authority, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Permitting Authority, such facts or information shall be corrected promptly.
    [Rule 62-4.160, F.A.C., and Rule 2.1401, JEPB]

Subsection B. Specific Conditions

1. The permittee shall demonstrate compliance with the conditions of the air construction permit and submit a complete "Application for Air Permit – Non-Title V Source" (DEP Form 62-210.900(3)) along with compliance records, test results, and such additional information as the Permitting Authority may by law require, to the Permitting Authority, at least ninety (90) days prior to the expiration date of the construction permit but no later than 90 days after completion of construction, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid operating permit.
   [Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

2. The permittee shall submit a desired revision to an air permit or application and receive the approval of the Permitting Authority prior to implementation.
   [Rule 62-4.080(2), F.A.C., and Rule 2.1401, JEPB]

3. Facility wide VOC emissions shall be less than 100 tons per year on a 12 month rolling total. Monthly VOC emissions shall be determined by using the latest VOC testing results (laminating process and cutting operations) and by using the best available VOC emission factors (board storage and VOC storage tanks).
   [Rule 62-210.200(203), F.A.C., and Rule 2.301, JEPB, and Applicant request to avoid Title V]

4. The permittee shall submit an "Annual Operating Report for Air Pollutant Emitting Facility" (DEP Form No. 62-210.900(5)) to the Permitting Authority each year. The annual operating report shall be submitted to the Permitting Authority no later than April 1st of the following year.
   [Rule 62-210.370(3), F.A.C., and Rule 2.301, JEPB]

5. The permittee shall conduct emission testing with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the air permit. If it is impractical to test at permitted capacity, then the emission unit may be tested at less than capacity; in this case subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days solely for the purposes of additional compliance testing to regain the permitted capacity in the air permit.
   [Rule 62-297.310(2), F.A.C., and Rule 2.1201, JEPB]

6. The permittee shall provide stack sampling facilities with a method of access that is safe and readily accessible in accordance with OSHA standards (29CFR1910, Subparts D and E). Permanent sampling facilities are required.
   [Rule 62-297.310(6), F.A.C., and Rule 2.1201, JEPB]

7. The permittee shall notify the Permitting Authority at least fifteen (15) days prior to emission unit compliance testing.
   [Rule 62-297.310(7)(a)9, F.A.C., and Rule 2.1201, JEPB]

8. The permittee shall file a report with the Permitting Authority on the results of each compliance test as soon as practical but no later than forty-five (45) days after completion of testing.
   [Rule 62-297.310(8), F.A.C., and Rule 2.1201, JEPB]

9. <u>Source Obligation:</u>
   a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Permitting Authority in the permit.
   b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), FAC, shall apply to the source or modification as though construction had not yet commenced on the source or modification.
   c. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), FAC., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), FAC and Rule 2.401, JEPB]

10. This facility is subject to Prevention of Accidental Releases [Section 112(r) of the Clean Air Act (CAA)].
    a. As required by Section 112(r)(7)(B)(iii), CAA, and 40CFR68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
    b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6), CAA.
    c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C. Send the required annual registration fee using approved forms made payable to: Cashier, Department of Community Affairs, State Emergency Response Commission.
    d. Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs
Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
Telephone: (850) 413-9921, Fax: (850) 488-1739

    e. Any Risk Management Plans, original submittals, revisions, or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 10162
Fairfax, VA 22038
Telephone: (703) 227-7650

    f. Any required reports to be sent to the National Response Center, should be sent to:

National Response Center
EPA Office of Solid Waste and Emergency Response
USEPA (5305 W)
401 M Street SW
Washington, D.C. 20460
Telephone: (800) 424-8802

11. The Permitting Authority for this project is the City of Jacksonville, Environmental and Compliance Department, Environmental Quality Division. All documents related to applications for permits to construct or operate an emissions unit and all documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Permitting Authority. The Permitting Authority's mailing address is:

Environmental and Compliance Department
Environmental Quality Division
214 North Hogan Street, Seventh Floor
Jacksonville, Florida 32202
Telephone: (904) 255-7100

Section III. Emission Units and Conditions

Emission Unit Number 003 - Foam Insulation Board Manufacturing

EU Number	Emission Unit Description	Pollution Control Equipment
003	Rigid foam insulation is made by combining two raw material streams or "sides". The "A Side" consists of 4,4'-methylene diphenylene diisocyanate (MDI) only. The "B Side" consists of a mixture of polyester resin (polyol), additives, and pentane. The two sides are combined at the pour table, which begins a reaction that creates foam. The pour table stack is the first emission point for this emission unit. The foam is enclosed between various substrates and facer materials to form a continuous length panel, which is introduced into a heated conveyor (laminator). The laminator chamber is enclosed and has one ventilation stack. The laminator chamber stack is the second emission point Two burners provide indirect heat to the laminator chamber. The burners exhaust through the laminator furnace stack. This is the third and final emission point for the Insulation Panel Manufacturing Laminator	**N/A**

Essential Potential to Emit (PTE) Parameters

1. The laminator process rate shall not exceed 95,000 board feet per hour or 832.2 million board feet per year. [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

2. Each natural gas fired burner shall not exceed a heat input rate of 0.478 Million British thermal units per hour. [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

3. The hours of operation for this emission unit are not limited, i.e., 8760 hours per year. [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Test Methods and Procedures

4. Testing for demonstration of compliance for VOC shall be performed prior to obtaining an operation permit. Testing shall be conducted within 60 days after achieving permitted capacity but no later than 180 days after initial operation of the emission unit following the construction of the new laminator. [Rule 62-4.070(3) and (Rule 62-297.310(7)(a)1, F.A.C., and Rule 2.1401 and Rule 2.1201, JEPB]

5. Testing for demonstration of compliance for VOC shall be performed in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 25A (as described in 40 CFR 60, Appendix A). [Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

Recordkeeping and Reporting Requirements

6. The owner/operator shall maintain monthly records of the following:
   a. Amount of foam board produced (board feet per hour and board feet per month)
   b. Amount of all VOC containing process substances used (gallons)
   c. VOC content of all VOC containing process substances used (pounds per gallon)
   d. Amount of all hazardous air pollutant (HAP) containing process substances used (gallons)
   e. HAP content of all HAP containing process substances used (pounds per gallon)
   f. VOC Emissions (pounds per month and tons per month)
   g. Individual HAP emissions (pounds per month and tons per month)
   h. Total HAP emissions (pounds per month and tons per month)
   i. A rolling total of VOC emissions for the previous twelve (12) months (tons per year)

   [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

7. Quarterly reports shall be submitted to the Permitting Authority describing the monthly usage of all VOC and HAP containing products; the VOC and HAP content of these products; the monthly total of VOC and HAP emissions; the amount of foam board produced each month; and the rolling twelve month total of VOC emissions for each month. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January-March, April-June, July-September, and October-December). The final report, which is due by the 30th of January for the quarter October –December, shall include a synopsis of the preceding year.
   [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

8. Monthly records shall be maintained for a minimum of five (5) years and be made available to the Permitting Authority upon request.
   [Rule 62-210.370(2)(h), FAC, and Rule 2.301, JEPB]