

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

File Nos.: 0570171-017-AO
County: Hillsborough

Troy Wolfe
National Facility Manager
Speedling, Inc.
P.O. Box 7129
Sun City, FL 33586

Enclosed is Permit Number 0570171-017-AO to operate a polystyrene expansion and molding facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the

petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested

persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

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 EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Ellie LeBoss – Air Observations, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

Clerk

Date

PERMITTEE:
Speedling, Inc.
P.O. Box 7129
Sun City, FL 33586

PERMIT/CERTIFICATION
Permit No: 0570171-017-AO
County: Hillsborough
Expiration Date: April 9, 2017
Project: Polystyrene Expansion and Molding

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

Speedling is a polystyrene expansion and molding facility. The operation at the facility involves utilizing a boiler, which provides steam to the two (2) expanders and the ten (10) presses that mold the polystyrene containers. The main expander (16.2 KW Hirsch, Model No. PREEX 60001 233 PDC) is limited to 1,500 lbs/hr of polystyrene beads. The expanders utilize steam to expand pentane containing polystyrene beads to different densities. After the beads are expanded, the material is pneumatically transported to an aging room where they are stored in twenty-four indoor storage containers. From the aging room, the expanded beads are pneumatically piped to the molding room where the steam operated presses mold the polystyrene containers.

The 300 HP Hurst Boiler (Model No. 300-150) provides steam for the expanders and the presses. The boiler (12.6 MMBtu/hr) fires natural gas exclusively and is categorically exempt from permitting pursuant to Rule 62-210.300(3)(a)34, F.A.C.

Volatile organic compound (VOC) emissions are emitted from this process and are solely characterized as pentane. Pentane emissions are released during the handling, curing, storage, expansion, and molding of the polystyrene beads. Emissions are controlled by limiting the polystyrene bead usage to 2,580,821 lbs/yr.

Location: 4300 Old US Highway 41, Sun City, FL 33586

UTM: 17- 354.10 E 3062.20 N

NEDS NO: 0570171

Emission Unit No.: 003 - Polystyrene Molding

References Permit No: 0570171-014-AC

Replaces Permit Nos.: 0570171-015/016-AO

PERMITTEE:
Speedling, Inc.

PERMIT/CERTIFICATION NOS.: 0570171-017-AO
PROJECT: Polystyrene Expansion and Molding

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
5. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
6. As requested by the permittee, in order to establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply:
[Rules 62-212.300 and 62-4.070(3), F.A.C., Air Construction (AC) Permit No. 0570171-014-AC and Permit Renewal Application Received October 13, 2011]
 - A) The maximum VOC emissions released as pentane from the polystyrene usage from the entire facility shall not exceed 94.2 tons for any 12 consecutive month period.
 - B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
7. No solvents containing VOC shall be used for cleanup or other activities at this facility.
[Rule 62-4.070(3), F.A.C. and AC Permit No. 0570171-014-AC]
8. To comply with the emission limits in Specific Condition No. 6, the following restrictions and limitations shall apply per twelve consecutive month period:
[Rule 62-4.070(3), F.A.C., AC Permit No.0570171-014-AC and Permit Renewal Application Received October 13, 2011]
 - A) Polystyrene Bead Usage: 2,580,821 pounds
 - B) Polystyrene Bead VOC Content (measured as Pentane): shall not exceed 7.3% VOC by weight for each lot received
 - C) The maximum process rate of the Hirsch expander shall not exceed 1,500 lbs/hr.

PERMITTEE:
Speedling, Inc.

PERMIT/CERTIFICATION NOS.: 0570171-017-AO
PROJECT: Polystyrene Expansion and Molding

SPECIFIC CONDITIONS:

- D) The maximum process rate of the backup expander shall not exceed 800 lbs/hr.
- E) The operating hours are not restricted.

9. Compliance with the emission limitations of Specific Condition No. 8.B) shall be determined using the manufacturer's test method, which is the California South Coast Air Quality Management District Method 306-91 with modifications.

[Rule 62-4.070(3) F.A.C. and Additional Information Received April 4, 2012]

10. The permittee shall maintain the manufacturer's certification, specified in Specific Condition No. 9 above, onsite for each lot of raw beads supplied.

[Rules 62-4.070(3) and 62-4.160, F.A.C.]

11. In order to demonstrate compliance with Specific Condition Nos. 6, 8 and 10, the permittee shall maintain a monthly recordkeeping system. All records shall be maintained onsite for a minimum of three (3) years. The records shall include, but not be limited to, the following information and shall be made available to any local, state, or federal air pollution agency upon request. Supporting documentation, such as copies of purchase requisitions and certificate of analysis, shall also be made available.

[Rule 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Month, Year
- B) Polystyrene Bead Usage (pounds)
- C) Polystyrene Bead Pentane Content (% by wgt.) tested and certified by the manufacturer for each lot of beads received.
- D) Pentane Emissions (tons/month)
- E) Rolling twelve month total of B) and D) above

12. The permittee shall not store, handle, process, or use in any process volatile organic compounds without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County:

[Rule 62-296.320(1), F.A.C.]

- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
- B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spills/waste as appropriate.

13. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

PERMITTEE:
Speedling, Inc.

PERMIT/CERTIFICATION NOs.: 0570171-017-AO
PROJECT: Polystyrene Expansion and Molding

SPECIFIC CONDITIONS:

14. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(204), F.A.C., Modification. The changes may include, but are not limited to, the following, and may also require prior authorization before implementation:
[Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment listed on page 1 of this permit.
- B) Installation or addition of any equipment or product which is a source of VOC.
- C) The use of materials and fuels other than those authorized by this permit.

15. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility.
[Rule 62-4.120, F.A.C.]

16. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

