**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

*Electronically Sent- Received Receipt Requested*
dahofferth@creativefoammedicalsystems.com

# FINAL PERMIT

**PERMITTEE**

Creative Foam Medical Systems
4800 NW 5th Street
Ocala, FL 34482

Authorized Representative:
Doug Hofferth, Engineering/Operations Manager

Air Permit No. 0830178-001-AC
Permit Expires: 01/30/2016
Site Name: Creative Foam Medical Systems
Minor Source Air Construction Permit
Project Name: Creative Foam–Foam Products

This is the final air construction permit, which authorizes construction of a custom molded polyurethane products manufacturing plant for molded medical cable insulator production. Creative Foam Medical systems (Standard Industrial Classification No. 3086) is located in Marion County at 4800 NW 5th Street in Ocala, Florida. The UTM coordinates are Zone 17, 383.19 km East, and 3229.76 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and 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 Orange County, Florida

February 2, 2015
F. Thomas Lubozynski, P.E. Date
Waste & Air Resource Programs Administrator

**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 February 2, 2015 to the persons listed below:

Doug Hofferth, Engineering/Operations Manager, Creative Foam Medical Systems, dahofferth@creativefoammedicalsystems.com
Bryan Petriko, P.E., August Mack Environmental, Inc., BPetriko@Augustmack.com
Alic Bent, Senior Technical Engineer, August Mack Environmental, ABent@Augustmack.com
Jeff Rustin, P.E., FDEP – Central District: jeff.rustin@dep.state.fl.us

Clerk Stamp

**FILED**, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

February 2, 2015
(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Proposed Facility

Creative Foam plans to construct and operate a custom molded polyurethane products manufacturing plant for molded medical cable insulator production. The facility will include a new closed mold foam production unit and an in-mold surface coating operation.

The closed mold foam production unit will utilize polyol and isocyanate to produce the foam. There is no release of emissions from the reaction of the raw materials (polyols and isocynates) because all the volatile organic compounds (VOCs) and hazardous pollutants (HAP) contained in the raw materials become chemically bound in the final product as consumable.

Mold release will be used to remove the foam from the molds. The mold release will be sprayed manually. The mold release accounts for all the volatile organic compound (VOC) emissions from the foam production line. The unit will utilize 1.25 pounds per hour of mold release.

The in-mold surface coating operation will coat the molded parts by a manual spray application. The applicator will use a maximum of 1.2 pounds of coating per hour. This operation is exempt from air permitting (Rule 62-210.300(3)(a)27., F.A.C.). Currently no recordkeeping is required for this activity.

This project will add the following emission unit.

| Facility ID No. 0830178 | |
|---|---|
| ID No. | Emission Unit Description |
| 001 | Small Polyurethane Mold Production Unit |

## 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 a non Title V source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is a natural minor source of air pollution for volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs).

## PERMIT HISTORY/AFFECTED PERMITS

No previous air permits for the facility. This is the initial air construction permit for the facility.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District, Waste & Air Resource Programs. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Waste and Air Resource Programs
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us**. In any electronic submittal, clearly identify the Air Permit Project No. 0830178-001-AC.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.)

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. 40 CFR Part 63, Subpart OOOOOO, Flexible Polyurethane Foam Production and Fabrication Area Sources;
   e. Appendix E. Polyurethane Mixing Machine Flow Diagram; and
   f. Appendix F. In-Mold Coating Process Flow Diagram

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. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air 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 two most recent months of records/logs specified in Specific Condition No. **A.10**.

   [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 001 Small Polyurethane Mold Production Unit

This section of the permit addresses the following emissions unit.

| Facility ID No. 0830178 | |
|---|---|
| ID No. | Emission Unit Description |
| 001 | Small Polyurethane Mold Production Unit |

## PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart A, General Provisions, Subpart A-General Provisions, as specified below, and 40 CFR 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, as specified in specific conditions **A.2**, **A.3.**, and **A.4.**; and as listed in Appendix D of this permit. The conditions are incorporated into this permit (attached and part of this permit).

| Subpart A reference | Applies to Subpart OOOOOO? | Comment |
|---|---|---|
| §63.1 | Yes | |
| §63.2 | Yes | Definitions are modified and supplemented by §63.11419. |
| §63.3 | Yes | |
| §63.4 | Yes | |
| §63.5 | Yes | |
| §63.6(a)-(d) | Yes | |
| §63.6(e)(1)-(2) | Yes | |
| §63.6(e)(3) | No | Owners and operators of subpart OOOOOO affected sources are not required to develop and implement a startup, shutdown, and malfunction plan. |
| §63.6 (f)-(g) | Yes | |
| §63.6(h) | No | Subpart OOOOOO does not require opacity and visible emissions standards. |
| §63.6 (i)-(j) | Yes | |
| §63.7 | No | Performance tests not required by subpart OOOOOO. |
| §63.8 | No | Continuous monitoring, as defined in subpart A, is not required by subpart OOOOOO. |
| §63.9(a)-(d) | Yes | |
| §63.9(e)-(g) | No | |
| §63.9(h) | No | Subpart OOOOOO specifies Notification of Compliance Status requirements. |
| §63.9 (i)-(j) | Yes | |

| | | |
|---|---|---|
| §63.10(a)-(b) | Yes | Except that the records specified in §63.10(b)(2) are not required. |
| §63.10(c) | No | |
| §63.10(d)(1) | Yes | |
| §63.10(d)(2)-(3) | No | |
| §63.10(d)(4) | Yes | |
| §63.10(d)(5) | No | |
| §63.10(e) | No | |
| §63.10(f) | Yes | |
| §63.11 | No | |
| §63.12 | Yes | |
| §63.13 | Yes | |
| §63.14 | Yes | |
| §63.15 | Yes | |
| §63.16 | Yes | |

[40 CFR 63, Subpart OOOOOO and Rules 62-204.800(11)(d) and 62-204.800(11)(b)111., F.A.C.]

A.2. Federal Regulatory Requirements: The facility must have a compliance certification on file by the startup date of the closed molding operation. This certification must contain the statements in paragraph 40 CFR 63.11417(c) (c)(1), (2), or (3), as applicable, and must be signed by a responsible official. [40 CFR 63.11417(c)(1)(i)]

A.3. Federal Regulatory Requirements: This facility will not be allowed to use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2). [40 CFR 63.11417(c)(1)(ii)]

A.4. Federal Regulatory Requirements: The facility is required to maintain records of the information used to demonstrate compliance, as required in §63.11416(f). The facility must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site. [40 CFR 63.11416(f) and Rule 62-4.070(3), F.A.C.]

*[Permitting Note:* §63.11416(f) states, "*You may demonstrate compliance with the requirements in paragraphs (b)(2) and (c) through (e) of this section using adhesive usage records, Material Safety Data Sheets, and engineering calculations."]*

## PERFORMANCE RESTRICTIONS

A.5. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

A.6. VOC Emissions: Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be used to minimize emissions:

a. Maintain tightly fitting cover, lids, etc. on all containers of VOCs when they are not being handled, used, etc.;

b. All equipment, fittings, valve lines, pipes, drums, tanks, etc. shall be properly operated and maintained;

c. Prevent excessive air turbulence across exposed VOCs; and

d. All VOC spills shall be attended to immediately and waste properly disposed, recycled, etc.

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

A.7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200(214) and 62-296.320(2), F.A.C.]

## EMISSIONS STANDARDS

A.8. VOC Emission Limitations: The closed mold foam production unit VOC emissions from the mold release are limited as follows:

| Pollutant | Emission Limit (tons per any consecutive 12 month period |
|---|---|
| Total Volatile Organic Compounds (VOCs) from the mold release | Less than 5.5 tons (11,000 pounds) |

[Rules 62-4.070(3) and 62-210.200(247), Potential to Emit, F.A.C.]

*[Permitting Note: The potential VOC emissions from the mold release are estimated to be 5.48 tons per year (Application No. 0830178-001-AC received December 15, 2014). The potential emissions generated by the proposed line are based on the maximum mold release usage (pounds/hour) and the weight fraction VOCs (100 percent).]*

A.9. Visible Emissions Limitation: Visible emissions from each particulate emissions source are limited to less than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

## RECORDS AND REPORTS

A.10. Monthly Log: In order to demonstrate compliance with Specific Condition No. **A.8.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

a. Facility Name, Facility ID No. (i.e., 0830178);

b. Month and year of record;

c. Most recent monthly total of mold release usage (gallons);

d. Most recent monthly total of closed mold foam production unit VOC emissions (tons) from the mold release;

e. Most recent consecutive 12-month total of mold release usage (gallons); and

f. Most recent consecutive 12-month total of closed mold foam production unit VOC emissions (tons) from the mold release.

Monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]
[Rule 62-4.070(3), F.A.C.]

A.11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, "As Supplied" sheets, Safety Data Sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years. Supporting documentation must be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

A.12. Record Retention: The records required in Specific Condition No. **A.10.** shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.
[Rule 62-4.070(3), F.A.C.]