ASP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	
	)	
Schneller, Incorporated - Polyplastex Division	)	ASP No. 96-I-01
	)	
Petitioner.	)	

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), Schneller, Incorporated, petitioned for approval to use EPA Method 25A in lieu of EPA Method 25 for the measurement of volatile organic compound emissions from a vinyl coating line.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. On March 27, 1996, Petitioner requested approval to use EPA Method 25A in lieu of EPA Method 25 as the compliance verification procedure for the incinerator on its vinyl coating line. [Exhibit 1]

2. Petitioner submitted additional information concerning the request for approval of an alternate sampling procedure on October 16, 1996. [Exhibit 2]

3. As justification for the use of EPA Method 25A in lieu of EPA Method 25, Petitioner conducted a Smith-Satterthwaite statistical analysis of the test results and stated, "The results of the statistical analysis indicate that the test results for both test methods are statistically equivalent at a 0.01 level of significance. At a 95% level of confidence, Method 25A has a closer confidence interval than Method 25 does." [Exhibit 2]

4. The following table summarizes the results of the EPA Method 25 and Method 25A source tests for Petitioner's incinerator on January 19, 1996:

	Inlet VOC Concentration (ppm C)		Outlet VOC Concentration (ppm C)		Destruction Efficiency (%)	
Run #	Method 25	Method 25A	Method 25	Method 25A	Method 25	Method 25A
1	13,563	18,804	544	273	96	98.6
2	13,933	20,007	322	216	97.7	98.9
3	13,292	19,494	284	228	97.9	98.8
Average	13,596	19,435	383	239	97.2	98.8

5. Pursuant to 40 CFR 60, Subpart FFF, "Standards of Performance for Flexible Vinyl and Urethane Coating and Printing," new facilities of this type are required to use EPA Method 25A to measure volatile organic compound concentrations.

6. After reviewing the test results, the U. S. Environmental Protection Agency stated, "Because the destruction efficiency results do not seem to be affected significantly by the test method used, the Schneller proposal to conduct future incinerator testing with Method 25A only is acceptable to Region 4." [Exhibit 3]

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Pursuant to Rule 62-297.310(7), F.A.C., the Department may require Petitioner to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permit is being violated.

3. Petitioner has provided reasonable justification that the use of EPA Method 25A for the measurement of volatile organic compound emissions will be adequate to verify compliance with the applicable standard.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. Petitioner shall use EPA Method 25A for the measurement of volatile organic compound concentrations at the inlet and outlet of the incinerator during compliance tests.

2. Petitioner shall use EPA Methods 1-4 to determine the flow rate at the outlet side the incinerator during compliance tests.

3. The Department retains the right to require Petitioner to use EPA Method 25 to determine the compliance status of the vinyl coating line, pursuant to Rule 62-297.310(7), F.A.C., if after investigation, it is believed that the use of EPA Method 25 is necessary to assess the compliance status of the affected facility.

4. Pursuant to Rule 62-297.310(8), F.A.C., Petitioner shall submit the compliance test report to the Air Quality Division Administrator of the Pinellas County Department of Environmental Management and to the District Director of the Department's Southwest District Office within 45 days of completion of the test.

DEP Permitting Note: (8/18/98)

Procedures for Petition for Administrative Review and Right to Appeal are not applicable to the Title V permit and are omitted (portion of page 3, pages 4,5, and portion of page 6 of the original Order).

DONE AND ORDERED this 20th day of December, 1996 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes

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