Carlisle Construction Material, Inc.
dba Insulfoam

Facility ID No. 1050239
Polk County

Title V Air Operation Permit Renewal

Permit No. 1050239-019-AV
(Renewal of Title V Air Operation Permit No. 1050239-018-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
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DRAFT/PROPOSED PERMIT

PERMITTEE:
Carlisle Construction Materials, Inc.
dba Insulfoam
6004 N. Westgate Blvd., Suite 120
Tacoma. WA 98406

Permit No. 1050239-019-AV
Insulfoam
Facility ID No. 1030239
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. Insulfoam is located in Polk County at 4500 South Frontage Road, Lakeland, Florida. UTM Coordinates are: Zone 17, 398.0 East and 3101.3 North. Latitude is: 28°01'56" North; and, Longitude is: 82°02'16" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

Draft/Proposed

_____

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

CZ/NEK/pp

Subsection A. Facility Description.

This is a block molded expanded polystyrene products manufacturing facility.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Block Molded Expanded Polystyrene Products Manufacturing Facility
003	"New" Stationary Spark Ignition (SI) RICE Engine *(see Appendix ICE)*
Unregulated Emissions Units and Activities	
002	300 HP natural gas fired boiler with a maximum heat input rate of 12.2 MMBtu/hour

Subsection C. Applicable Regulations.

Based on the Title V renewal application received March 9, 2011, this facility is NOT a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No.
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, F.A.C.	All
40 CFR 60, Subpart A, NSPS General Provisions	002 & 003
40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	002
40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	003

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.
[Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. 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" means 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.
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions.

a. Maintain tightly fitting covers, lids, etc., on all containers of VOC/OS's when they are not being handled, tapped, etc.;

b. Prevent excessive air turbulence across exposed VOC/OS's;

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC/OS's so that it can be covered when not in use;

d. All fittings, valve lines, etc., shall be properly maintained; and

e. All VOC/OS's spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1050239-016-AC]

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Dust emissions from cars, trucks and forklifts, and spread of foam dust and particles are prevented by good housekeeping practices and periodic sweeping/cleaning of the plant property and parking lots.
[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report - The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee - The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance - The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA) - If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. 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.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Subsection A. Emissions Unit 001 – Block Molded Expanded Polystyrene Products Manufacturing Facility

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	The raw materials for the process at this facility are Expanded Polystyrene (EPS) resins, called beads, which have a sand like appearance. EPS resin is impregnated with the blowing agent pentane, typically 3.5 to 5.0% by weight, although sometimes ranging up to 7.0 % by weight. The resins are shipped to the facility in lined 2,200 pound bags. The beads are augured into pre-expanders (Idro, Model PJX4000 pre-expander and/or Hirsh 12000 pre-expander) where steam from the 200 and 300 hp boilers and mechanical agitation is used to expand the beads to approximately 1/8" diameter. The steam softens the polymer and causes the pentane to expand inside the bead and blow outward. A portion of the initial pentane content of the bead is lost during this process and is either captured by the Pentane Collection System or escapes into the building. The facility operates under one of two operating procedures. While operating under Operating Procedure 1 (OP 1) emissions captured by the Pentane Collection System are routed to the Regenerative Thermal Oxidizer (RTO) VOC emission control device. While operating under Operating Procedure 2 (OP 2) emissions captured by the Pentane Collection System are routed to the RTO bypass stack. The expanded polystyrene, now called pre-puff, is then sent through a fluidized bed dryer prior to being blown to the aging bags for stabilization. The pre-puff is vacuum fed to a bag farm for pre-puff aging and stabilization from 4 to 24 hours. The pre-puff is stored in 5,500 cubic foot aging bags. The facility currently has a bead storage capacity of 49,500 cubic feet. The aging step allows the temperature to equalize and the pre-puff to achieve the proper conditions for molding. During the aging process, a portion of the pentane remaining is exchanged for air. The bag farm will be maintained as a Permanent Total Enclosure with a capture efficiency of 100%. When operating under Operating Procedure 1 (OP 1) all of the pentane emissions from this process will be directly vented to the Regenerative Thermal Oxidizer VOC emission control device through the Pentane Collection System. While operating under Operating Procedure 2 (OP 2) emissions from this process will go through the Pentane Collection System and be exhausted through the RTO bypass stack. The prepuff is then transferred to the "virgin bag" associated with a mixing station. Regrind material, which is waste polystyrene pieces already expanded and cured, is stored in 5 regrind bags. The regrind material is then transferred to the "regrind bag" associated with the mixing station and may be blended with the prepuff. The prepuff /regrind material is then transferred to the molder's fill bag prior to entering the Hirsch Italia Block Molder, Type Oyster MS1 or 16' Idro block mold where steam from the boilers is used to further expand the prepuff/regrind material and fuse them together into block forms. During the molding cycle a portion of the initial pentane content of the beads is driven from the beads. While operating under OP 1 the emissions captured by the Pentane Collection System will be routed to the RTO. While operating under OP 2 the emissions captured by the Pentane Collection System will be routed to the RTO bypass stack. After molding the blocks go to a product storage/curing and cutting area. A portion of the expanded polystyrene blocks are shipped in the original molded form. Others are set aside to stabilize from 24-96 hours and are then cut into various product sizes and shapes with an electric hot wire. In either case, the blocks or cut products may be directly packaged and shipped to the customer, or placed in inventory storage pending shipment. A further portion (assumed to be 28%) of the initial pentane content will be emitted as fugitives. The remaining portion of the initial pentane content (assumed to be 15%) stays within the finished and shipped product as a residual concentration. The products are used in construction and insulation.

	Emission Sources Pre-Expander Process Units - Pentane emissions* from the pre-expanders emitted through Stack Nos. 101 and 104 are captured by the Pentane Collection System and routed to the Regenerative Thermal Oxidizer VOC emission control device in OP 1. While operating under OP 2 emissions are captured by the Pentane Collection System and routed to the RTO bypass stack. Uncaptured pentane emissions from this operation are exhausted into the building from the pre-expanders' dump vent Stack Nos. 102 and 105 and the fluidized bed dryers through Stack Nos. 103 and 106 and then exhausted to the atmosphere through building vents and openings. Overall capture efficiency from this pre-expansion operation is 50%. *(*Note: 24% of the pentane content of the original material typically is released during initial expansion.)* Bead Aging Bag Farm - Pentane emissions* from the 15 aging bags in the bag farm are captured by the Pentane Collection System and routed to the Regenerative Thermal Oxidizer VOC emission control device in OP 1. While operating under OP 2 emissions are captured by the Pentane Collection System and routed to the RTO bypass stack. Emissions from the virgin mixing station bag for the 16' Idro block mold are transferred back into the bead aging bag farm for collection by the Pentane Collection System. The bag farm is in a Permanent Total Enclosure, therefore the capture efficiency from the bag farm is 100%. *(*Note: 19% of the pentane content of the original material typically is released during the aging process.)* Mold Process Units - Pentane emissions* from the Hirsch Italia Block Molder, Type Oyster MS1, emitted through Stack No. 402, and from the 16' Idro block mold through Stack No. 404 are captured by the Pentane Collection System and routed to the Regenerative Thermal Oxidizer VOC emission control device in OP 1. While operating under OP 2 emissions are captured by the Pentane Collection System and routed to the RTO bypass stack. Uncaptured pentane emissions from this operation are exhausted into the building from the mold depressurization exhaust Stack Nos. 403 and 405 and then exhausted to the atmosphere through building vents and openings. Overall capture efficiency from the mold process units is 50%. *(*Note: 14% of the pentane content of the original material typically is released during molding.)* Product Storage/Curing and Cutting Process Units - Uncontrolled pentane emissions* from the block storage and curing area are exhausted to the atmosphere through 10 side building vents designated as Stack Nos. 501 through 510. There are no expected particulate matter emissions outside the building from polystyrene block cutting and grinding operations. *(*Note: 28% of the pentane content of the original material typically is released during curing.)* Fabrication - VOC emissions from the application of adhesives and laminates to the fabricated polystyrene products are exhausted to the atmosphere through 5 building vents designated as Stack Nos. 601 through 605.

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permits 1050239-016-AC and 1050239-017-AC]

A.2. Operating Procedure Definitions and Restrictions - This facility is allowed to operate under either one of the following operating procedures:

a. Operating Procedure 1 (OP 1) - Emissions captured by the Pentane Collection System will be routed through the regenerative thermal oxidizer (RTO).

b. Operating Procedure 2 (OP 2) - Emissions captured by the Pentane Collection System will not be routed through the RTO, but will exhaust through the RTO bypass stack.

c. OP 2 is only authorized when the facility's most recent consecutive 12-month total VOC emissions are less than 220 tons (see Specific Condition No. A.15. for recordkeeping requirements).

[Rule 62-4.070(3); Construction Permits 1050239-016-AC and 1050239-017-AC]

A.3. Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Control Technology

A.4. OP 1 Regenerative Thermal Oxidizer (RTO) Operations – When the facility is operating under OP 1, VOC emissions shall be controlled by a RTO that provides for the reduction of at least 95 percent of the VOCs which enter the RTO. The RTO shall be operated as follows:

a. the minimum combustion chamber temperature of the RTO shall be 1500° F.; and

b. the combustion chamber temperature shall be monitored continuously on a strip chart recorder.

[Rule 62-4.070(3), F.A.C. and 62.210.650, F.A.C.; Construction Permits 1050239-016-AC and 1050239-017-AC]

Emission Limitations and Standards

(Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

Unless otherwise specified, the averaging time for Specific Condition A.9. is based on the specified averaging time of the applicable test method.

A.5. Emission Limitations - The VOC emissions from the facility are limited as follows:

a. The total combined volatile organic compound (VOC) emissions from the usage of adhesives, laminates, and expandable polystyrene beads* shall not exceed 244 tons per any consecutive 12-month period.

b. The total VOC emissions from the usage of adhesives and laminates shall not exceed 9.9 tons per any consecutive 12-month period.

*(*Permitting Note: The only potential source of HAPs from this facility is from adhesives and laminates. The limitation in b. above assures that emissions of any individual HAP and total HAPs cannot exceed the major source thresholds, thereby ensuring this facility will remain a minor source of HAPs.)*

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permits 1050239-016-AC and 1050239-017-AC]

Monitoring of Operations

A.6. Compliance Assurance Monitoring - This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM when operating under Operating Procedure 1. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and, Rules 62-204.800 and 62-213.440(4)(b)4., F.A.C.]

Test Methods and Procedures

A.7. Test Methods - Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-297.401, F.A.C.; Construction Permit 1050239-016-AC]

A.8. Common Testing Requirements - Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Testing Requirements - No compliance testing is required if the facility operates under OP 2 for an entire federal fiscal year (October 1 - September 30). If the facility operates under OP 1 to maintain compliance with emission limitations specified in Specific Condition No. A.5. at any time during a federal fiscal year (FFY) and no compliance testing had been conducted during the previous FFY then compliance testing is required within 30 days of switching from OP 2 to OP 1. If compliance testing was conducted during the previous FFY the testing can be conducted at any time during the FFY the switch to OP 1 was made. If testing is required, the following compliance tests shall be conducted:

a. visible emissions from the RTO VOC emission control device exhaust stack;

b. VOC emissions from the RTO exhaust stack (outlet mass emission rate);

c. VOC destruction efficiency of the RTO (based on testing the RTO inlet and outlet mass emission rate); and

d. VOC capture efficiency of the Pentane Collection System.

[Rules 62-297.310(7), 62-297.440(7), and 62-297.450(1)(a), F.A.C.; Construction Permit 1050239-017-AC]

A.10. Additional Compliance Test Requirements – The following additional testing procedures shall be followed:

a. Visible emissions testing should be conducted concurrently with one of the VOC compliance tests.

b. VOC emissions testing shall be conducted at the RTO VOC emission control device inlet and outlet.

A.10. *(continued)*

c. The Pentane Collection System VOC capture efficiency testing shall be conducted concurrently with the VOC destruction efficiency and emissions testing of the RTO VOC emission control device.

d. Testing shall take place when all processes are operating at a rate representative of the normal production rate. The pentane content of the beads shall be less than or equal to 4.6% , or the lowest pentane content beads available if beads with less than 4.6% pentane content are not available. Testing shall occur when both pre-expanders and both molds are operating. Testing at conditions that are not representative of normal operating conditions may invalidate the test.

[Rules 62-4.070(3), and 62-297.401, F.A.C.; Construction Permit 1050239-016-AC]

A.11. Modification Notification and Testing - A modification, as defined in Rule 62-210.200, F.A.C., is prohibited without prior approval by the Department, however if any other physical or operational change is made to the control system, the owner or operator shall notify the Air Program of the Department's Southwest District Office of the change within 10 working days after making such change. The Department shall require the owner or operator of the affected activity, process, or emissions unit to conduct a new capture efficiency test and/or stack test if the Department has reason to believe that a physical or operational change to the Pentane Collection System has decreased the overall emissions reduction efficiency of the system.
[Rule 62-297.450(4)(c), F.A.C.; Construction Permit 1050239-016-AC]

A.12. Compliance Test Notifications - The permittee shall notify the Air Compliance Section of the Southwest District office in writing at least 15 days prior to the date on which any EPA Methods 9 and 25 compliance testing is to begin, and 30 days prior to the date on which any capture efficiency testing is to begin. The notice shall include, the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having each test conducted.

(*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-297.310(7)(a)9., and 62-297.450(4)(d) F.A.C.; Construction Permit 1050239-016-AC]

Recordkeeping and Reporting Requirements

A.13. Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.14. Test Report Requirements - The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of the Southwest District Office within 45 days of testing with the results of each such test. The test report shall provide, at minimum, the information required in Rule 62-297.310(8), F.A.C. In addition the report shall include the following:

a. inlet and outlet VOC mass emission rate of the RTO VOC emission control device and supporting calculations;

b. VOC capture efficiency of the Pentane Collection System;

c. VOC destruction efficiency of the RTO;

d. RTO operating parameters including combustion chamber temperature and flow rates during the test period;

A.14. *(continued)*

e. Pentane content of the beads being processed during the compliance test;

f. a copy of the daily log for each test day *(see Specific Condition No. A.15. below)*; and

g. a copy of the monthly log for the month the test was conducted *(see Specific Condition No. A.15. below).*

Failure to submit the above data or the actual operating conditions may invalidate the test.
[Rules 62-4.070(3) and 62-297.310(8), F.A.C.; Construction Permit 1050239-016-AC]

A.15. VOC Recordkeeping – To determine compliance with the VOC (pentane) emission limitations of Specific Condition No. A.5. the following recordkeeping shall be maintained.

DAILY

a. facility name, facility ID No., emission unit No. and description;

b. Record the Date (month/day/year).

c. Record the appropriate operating procedure number under which the facility is operating (e.g., OP 2).

d. Record the product name of each type of expandable polystyrene bead used (i.e., Huntsman 7654).

e. Record the associated amount (in pounds) of each type of expandable polystyrene bead used.

MONTHLY

f. Record the Month and Year.

g. Record the month's total amount (in pounds) of each type of expandable polystyrene bead used by product name.

h. Record the highest pentane content value (e.g., 5.9%) from the manufacturer's "specification range" for each type of expandable polystyrene bead used by product name. **At the permittee's option, in lieu of the highest of the "specification range", the actual pentane content value from each lot number may be recorded for each type of expandable polystyrene bead by product name and lot number along with its amount (in pounds) used.**

i. Record the pentane (VOC) emissions (in tons) from each type of expandable polystyrene bead used by product name.

j. Record the total combined pentane (VOC) emission (in tons) from all the expandable polystyrene beads used.

k. Record the most recent consecutive 12-month period total of pentane (VOC) emissions (in tons) from all the expandable polystyrene beads used.

l. Record the amount (in pounds) of each adhesive and laminate used by product name.

A.15. *(continued)*

m. Record the VOC content (weight percent) for each adhesive and laminate used by product name.

n. Record the amount of VOC emissions (in tons) from each adhesive and laminate used by product name.

o. Record the total combined amount of VOC emissions (in tons) from all the adhesives and laminates used.

p. Record the total combined amount of VOC emissions (in tons) from all the adhesives, laminates, and expandable polystyrene beads used.

q. Record the most recent consecutive 12-month period total of VOC emissions (in tons) for all the adhesives, laminates, and expandable polystyrene beads used.

These records and supporting documentation, such as MSDS sheets and manufacturer's certifications, shall be kept at the facility for a minimum of 5 years and made available to the Department upon request. Daily records shall be completed by the end of the following 3rd business day and monthly records shall be completed by the end of the following month.
[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.; Construction Permit 1050239-017-AC]

Emission Calculation Method Requirements

A.16. VOC Emission Calculation Methods for Operating Procedure 1 - VOC emissions from the pre-expanders, bead aging bag farm and block molds shall be calculated using the Pentane Collection System capture efficiency measured during the most recent compliance testing or the construction permit application proposed capture efficiency of 66%, whichever is lower. The Regenerative Thermal Oxidizer destruction efficiency shall be the value measured during the most recent compliance testing or the construction permit application proposed destruction efficiency of 95%, whichever is lower. VOC emissions from the application of adhesives and laminates as well as fugitive VOC emissions from the product storage/curing and cutting process area shall be added to the VOC emissions exhausted from the RTO VOC emission control device to determine the total VOC emissions from the facility.
[Rule 62-4.070(3) F.A.C.; Construction Permit 1050239-016-AC]

A.17. VOC Emission Calculation Methods for Operating Procedure 2 - VOC emissions from the application of adhesives and laminates as well as fugitive VOC emissions throughout the facility not captured by the Pentane Collection System shall be added to the VOC emissions exhausted from the RTO bypass stack to determine the total VOC emissions from the facility.
[Rule 62-4.070(3) F.A.C.; Construction Permit 1050239-017-AC]

A.18. VOC calculation assumptions - Emission calculations shall be based on the following assumptions:

a. 24% of the pentane content of the raw material is released during initial expansion;

b. 19% of the pentane content of the original material is released during the aging period;

c. 14% of the pentane content of the original material is released during molding; and

d. 28% of the pentane content of the original material is released during curing.

A.18. *(continued)*

Note: The remaining 15% of the pentane content of the original material remains in the finished product.

[Rule 62-4.070(3) F.A.C.; Construction Permit 1050239-016-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary

Appendix CAM, Compliance Assurance Monitoring Plan

Appendix I, List of Insignificant Emissions Units and/or Activities

Appendix ICE, Requirements for Internal Combustion Engines.

Appendix NSPS 40 CFR 60, Subpart A – General Provisions

Appendix NSPS 40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Appendix RR, Facility-wide Reporting Requirements

Appendix TR, Facility-wide Testing Requirements

Appendix TV, Title V General Conditions

Appendix U, List of Unregulated Emissions Units and/or Activities

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History

Table 1, Summary of Air Pollutant Standards and Terms

Statement of Basis