PERMITTEE

Montco Research Products
Post Office Box 235
Hollister, Florida 32147-0235

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

PROJECT

Air Permit No. 1070037-004-AO
Renewal
Montco Research Products

On January 26, 2011 Montco Research Products, a Specialty Chemical Manufacturing Facility submitted an EPSAP permit application 2706-1 for the renewal of permit No. 1070037-003-AO and for an increase in the number of batches of Ethyl Benzyl Chloride production.

The request to increase the number of batches of Ethyl Benzyl Chloride production has been withdrawn since it would require an air construction permit separate from the permit renewal application.[a]

Project 004 authorizes the final air operating permit renewal, for the continued operation of the facility. Montco Research Products is a minor source Non-Title facility with potential emissions of regulated hazardous air pollutants (HAP) less than 10 tons per year of any one HAP and less than 25 tons per year of any combination of HAP's pursuant to Chapter 62-210, FAC.

Specific Condition # 3 and Specific Conditions # 4 have been revised as follows:

From:

3. Maximum Rate Number of Batches: The maximum number of batches of Ethyl Benzyl Chloride produced shall not exceed 11.2 batches per week.
   [Air Construction Permit No. AC54-251968 issued April 28, 1995]

4. Maximum Rate Number of Batches: The maximum number of batches of Chloromethyl Naphthalene produced shall not exceed 2.5 batches per week.
   [Air Construction Permit No. AC54-251968 issued April 28, 1995]

To:

3. Maximum Rate Number of Batches: The maximum number of batches of Ethyl Benzyl Chloride produced shall not exceed 572 batches per year.
[Permit No. 1070037-004-AO]

4. Maximum Rate Number of Batches: The maximum number of batches of Chloromethyl Naphthalene produced shall not exceed 130 batches per year.
[Permit No. 1070037-004-AO]

These changes have been made to add flexibility to the batch production process at the facility.

Specific Condition # 7 (below) of Permit No 1070037-003-AO has been removed from the renewal permit as there are no specific applicable regulations for the limitations.

7. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	LOCATION I.D.	EMISSION RATE LBS/HR	TPY	FAC RULE
Naphthalene	01	0.61 **NOTE (1)**	2.68 **NOTE (2)**	----
Ethyl benzene	01	0.60 **NOTE (1)**	2.65 **NOTE (2)**	----
Formaldehyde	01	0.008 **NOTE (1)**	0.035 **NOTE (2)**	----
HCl	01	0.046 **NOTE (1)**	0.20 **NOTE (2)**	----
Ethyl benzene	02	2.85 **NOTE (1)**	0.09 **NOTE (3)**	----

NOTE (1) Basis: Emission estimates submitted August 16, 1994.
NOTE (2) Hours of operation are 24 H/D, 7 D/W, 52 W/Y.
NOTE (3) Basis: 100 gallon per minute fill rate; 4,907,060 lbs per year into storage tank.
[Air Construction Permit No. AC54-251968 issued April 28, 1995]

[a]On February 16, 2011 via telephone, the Department contacted Mr. Terry Clayton, Plant Manager for Montco Research Products informing him that in order to increase throughput (no. of btaches) the facility would be required to apply for an air construction permit persuant to 62-210.300(1)(b), F.A.C.

Notwithstanding the expiration of an air construction permit, all limitations and requirements of such permit that are applicable to the design and operation of the permitted facility or emissions unit shall remain in effect until the facility or emissions unit is permanently shut down, except for any such limitation or requirement that is obsolete by its nature (such as a requirement for initial compliance testing) or any such limitation or requirement that is changed in accordance with the provisions of subparagraph 62-210.300(1)(b)1., F.A.C.

1. Except for those limitations or requirements that are obsolete, all limitations and requirements of an air construction permit shall be included and identified in any air operation permit for the facility or emissions unit. The limitations and requirements included in the air operation permit can be changed, and thereby superseded, through the issuance of an air construction permit, federally enforceable state air operation permit, federally enforceable air general permit, or Title V air operation permit

2. The force and effect of any change in a permit limitation or requirement made in accordance with the provisions of subparagraph 62-210.300(1)(b)1., F.A.C., shall be the same as if such change were made to the original air construction permit.

CONCLUSION

The final action is to issue the permit as described above.