Florida Department of Environmental Protection

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

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

Air Permit Number: 1070037-004-AO
Date of Issue: March 1, 2011
Expiration Date: March 1, 2016

Authorized Representative:
Terry Clayton

Montco Research Products
Non-Title V Air Operation Permit
AO Renewal

This is the final air operating permit renewal, which authorizes the continued operation of Montco Research Products, a Specialty Chemical Manufacturing Facility (Standard Industrial Classification No. 2869). The facility is located in Putnam County, Janice Drive, Hollister, Florida. The UTM coordinates are Zone 17, 2731.8km East; and 419.9 km N.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. 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 operation 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.).

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 Jacksonville, Florida.

Christopher L. Kirts, P. E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice and Final Permit) 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 March 1, 2011 to the persons listed below.

Terry Clayton, Plant Manager Montco Research Product, montco@gbso.net
Vernon Adams, Consultant PLE Consulting vernonadams@hotmail.com

Clerk Stamp

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

(Clerk) 3/1/2011 (Date)

FACILITY AND PROJECT DESCRIPTION

The facility operates a series of batch reactors and distillation columns for the production and purification of Specialty Chemicals. The reactor off-gases are bubbled through storage tanks containing various strenghts of aqueous HCL before entering the scrubber. All exhaust from the manufacturing process are collected and routed to the scrubber before exhaust into the environment.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of hazardous air pollutants (HAP) are 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.

Facility ID No. 1070037	
EU No.	Emission Unit Description
001	Packed Bed Scrubber
002	Ethyl Benzene Storage Tank

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 not a Title V major 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Northeast District Office, Air Resource Management. The Permitting Authority's mailing address and telephone number are: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590; Telephone: 904/256-1700. All documents related to applications for permits shall be submitted to the Permitting Authority.

2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Northeast District Office, Air Resource Management. The Compliance Authority's mailing address and telephone number are: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256; Telephone: 904/256-1700. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Compliance Authority.

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;
   d. Appendix D. Common Testing Requirements

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the 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, 62-296 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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1), and 62-212.300, (1) (a), F.A.C.]

7. The ID Number and Project Name for this source shall be used on all correspondences.

8. A completed **Application for Non Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

   [Rule 62-4.090, F.A.C.] [Rules 62-4.055 and 62-4.220, F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
001	Packed Bed Scrubber
002	Ethyl Benzene Storage Tank

PERFORMANCE RESTRICTIONS

1. Hours of Operation: The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 hours per year.

   [Rules 62-4.160(2), F.A.C, and Rule 62-210.200(PTE), F.A.C., Definitions- Potential to Emit (PTE)]

2. Maximum Rate Material Usage: The maximum raw material utilization rates (per batch basis) shall not exceed the quantities specified in the supplemental information received August 16, 1994.

   [Air Construction Permit No. AC54-251968 issued April 28, 1995]

3. Maximum Rate Number of Batches: The maximum number of batches of Ethyl Benzyl Chloride produced shall not exceed 572 batches per year.

   [Rule 62-210.200(PTE), F.A.C.]

4. Maximum Rate Number of Batches: The maximum number of batches of Chloromethyl Naphthalene produced shall not exceed 130 batches per year.

   [Rule 62-210.200(PTE), F.A.C.]

5. Maximum Storage Tank Rate: The maximum throughput of the Ethyl benzene storage tank shall not exceed 4,907,060 pounds per year. The fill rate shall not exceed 100 gallons per minute.

   [Air Construction Permit No. AC54-251968 issued April 28, 1995 EPSAP Permit Application for renewal # 2706-1 received January 26, 2011]

6. Control Unit: Control unit shall remain in place at all times during operation. If there is a malfunction on the control units, the owner or operator shall immediately take corrective actions to minimize excess emissions.

   [Rule 62-4.070(3) and 62-210.700(1) F.A.C]

EMISSIONS STANDARDS

7. General Visible Emissions Standard: No person shall cause, let, permit, suffer or allow to be discharge into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity.

   [Rule 62-296.320(4)(b)1., F.A.C.]

8. Special Compliance Tests: When the department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued to those rules is being violated, it shall require the owner or operator of the emission unit to conduct compliance tests which identify the nature and the quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

   [Rule 62-297.310(7)(b), F.A.C.]

TEST METHODS AND PROCEDURES

9. Visible Emissions Test: Compliance shall be determined by EPA Method 9, upon the Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.
   The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations.

   [Rule 62-296.320(4), F.A.C.]

   Permitting Note: The emissions unit does not require regularly scheduled VE performance testing, since the applicable visible emission limitation is a facility-wide limitation and there is not an applicable allowable mass emission limitation. However, a visible emissions opacity test may be required at these Emissions Points upon Department request pursuant to the Special Compliance Test requirements of Rule 62-297.310(7)(b), F.A.C. (refer to Appendix D, Condition 4 of this permit).

   [Rule 62-297.310(7)(a)4.a., F.A.C.]

10. Permitted Capacity. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operation does not exceed 100 percent of the maximum operation rate allowed by the permit. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

    [Rule 62-297.310(2), F.A.C.]

NOTIFICATION, RECORDKEEPING AND REPORTING REQUIREMENTS

11. Recordkeeping: Compliance shall be determined by recording the following data for each material used (see Specific Condition No. 2):

    a. Amount per batch per process by maintaining a file of plant usage logs (pounds)
    b. Number of batches per process per week

    [Air Operation Permit No. 1070037-003-AO]

12. Reporting: Submit a report containing the data required in Specific Condition No. 11 for each of the preceeding five years with permit renewal application.

    [Air Operation Permit No. 1070037-003-AO]

13. VOC Emissions: Procedures to minimize VOC emissions shall include, but not be limited to:

    a. Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.

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

    c. All fittings, valves, lines, etc. shall be properly maintained.

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

    e. Maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

    [Air Operation Permit No. 1070037-003-AO]

14. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

    [Rule 62-297.310(8), F.A.C.]

15. Control Units/Maintenance Record: The owner or operator shall maintain the malfunction and maintenance records of all control units. The record(s) shall be kept on site for at least 5 years, and shall be made available upon Department's request.

    The following information shall include but not limited to:

    a. Date and type of malfunctions that occurred.
    b. Duration of the malfunction and correction action taken.
    c. Maintenance conducted on as a result of malfunction

    [Rules 62-4.070(3) and 62-210.700(1), F.A.C]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

16. HCL Emissions: The packed bed scrubber (Emission Point 001) shall be tested for HCL emissions using Method 26 upon Department request.

[Air Operation Permit No. 1070037-003-AO]