



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

PERMITTEE:

Hunter Panels LLC, Division of Carlisle Syntec, Inc.
Hunter Panels LLC
P.O.Box 7000
Carlisle, PA 17013

I.D. Number: 0230044
Permit/Cert Number: 0230044-002-AF
Date of Issue: September 21, 2005
Expiration Date: September 21, 2010
County: Columbia
Latitude/Longitude: 30° 10' 18" N; 82° 35' 20" W
UTM: E-(17) 347.010; N-3338.874
Project: FESOP

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

PROJECT

Project No. 002 is for the Federal Enforceable State Operating Permit (FESOP) for the facility that manufactures polyisocyanurate foam insulating panels for use in commercial and industrial roofing applications.

EMISSION UNIT

001: Polyisocyanurate Foam Insulating Panels
002: Cutting Operation

CONTROL EQUIPMENT

Mikropul- Mikro Pulsaire Model 224-10-TRW-A

FACILITY DESCRIPTION

This facility manufactures polyisocyanurate foam insulating panels for use in commercial and industrial roofing applications. Polyisocyanurate Foam Insulating Panels are produced by reacting a polyol in a blend including a phosphate based flame retardant and catalyst with polymeric diphenylmethane diisocyanate. Pentane material is used as an expanding or blowing agent in the production of the panels. The main emission from the facility will be from the use of pentane, a VOC. VOC emissions are also released from the Board Cutting Operation and the Insulation Board Storage Operation. There are three (3) stacks associated with this facility: **EP01:** (S1)- Pour Table Exhaust has VOC and HAP emission, **EP02:** (S2)- Laminator Exhaust have VOC emissions, and **EP03:** (S3)- Baghouse Exhaust has PM₁₀ and VOC emissions.

The facility is a **synthetic minor source (FESOP)** of air pollution because the operational limit assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Chapter 62-210, F.A.C.

Pollutants: PM₁₀ and VOC.

For informational purposes only: Minor amounts of the HAP (MDI) will be emitted. PTE is 2.9 lb/yr.

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GENERAL CONDITIONS:**REGULATORY CLASSIFICATION**

This facility is subject to regulation under: Rule 62-296.320, F.A.C. General Provisions for PM₁₀ and VOC.

OPERATING LOCATION

Located at 388 Southeast Enterprise Ct., Lake City, Columbia County, Florida

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department:

Construction application received December 9, 2003.
FESOP application received January 7, 2005
Additional information received July 15, 2005

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does no relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any record that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

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GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurement;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. The I.D. No. and project name for this source shall be used on all correspondence.
2. **Hours of Operation:** The hours of operation **are not** restricted 24 H/D; 7 D/W; 52 W/Y (8760 H/Y).
[Rule 62-210.200(PTE), F.A.C.]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

3. **Permitted Capacity:** The maximum operating rates are listed below and shall not be exceeded without prior Department approval.

| Emission Unit | Operating Capacity |
|---------------|---|
| FACILITY-WIDE | Maximum Foam Production Rate: 58,830,000 lb/yr Maximum Pentane (VOC) usage rate: 3,700,000 lb/yr 200 Linear feet of insulating board per minute Amount of scrap and percentage of scrap that is grounded into dust shall not exceed 10% of the amount of scrap produced. |

[Capacity limits requested by Applicant in application received December 9, 2003 and July 15, 2005]

4. **Maximum Allowable Emission Rate (VOC) facility wide:** VOC Emissions shall not exceed 99 TPY.
[Rule 62-210.200(PTE), F.A.C.; CAP requested by Applicant in application received December 9, 2003]
5. **Visible Emissions EU002:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1, F.A.C.]
6. **VOC (Volatile organic compound emissions or organic solvents emission):** No person shall 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 facility shall comply with, but are not limited to the following:
 - a) All material containing VOC/OS's shall be stored in closed containers and/ or in small automatic closing safety cans.
 - b) All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of material,
 - c) Immediately attend to all spills as appropriate.[Rule 62-296.320(1)(a), F.A.C.]

TESTING REQUIREMENTS

7. **Testing (EU001 & 002):** Test the emissions for the following pollutant(s) within 45 days after startup, notify the Department 15 days prior to testing [FAC Rule 297.310(7)(a)1, and submit the test report documentation to the Department within 45 days after completion of the testing [FAC Rule 297.310(8)(b)]:

| EU | Pollutant | Test Method | Test Interval | Rule |
|-----------|-----------|----------------|-----------------------------|---------------------------------|
| 001 & 002 | VOC | EPA Method 25A | Annually NOTE (1) | Rule 62-297.401(25)(a), F.A.C. |
| 002 | V.E. | EPA Method 9 | Annually NOTE (2) | Rule 62-296.320(4)(b)4., F.A.C. |

NOTE (1) A formal VOC emission shall be conducted during each federal fiscal year (October 1 - September 30). Rule 62-297.310(7)(a)4., F.A.C. [40 CFR 60, Appendix A for volatile organic compounds].

NOTE (2) A formal compliance test shall be conducted during each federal fiscal year (October 1 - September 30). Rule 62-297.310(7)(a)4., F.A.C.

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SPECIFIC CONDITIONS:**Specific Condition No. 7 continued:**

Tests and test reports shall comply with the requirements of FAC Rules 62-297.310(8) and 62-297.401, respectively.

8. **Testing:** 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 pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and 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.]

9. **Testing:** Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at capacity as defined below. If it is impracticable to test at the permitted capacity, an emissions unit may be tested at less than the minimum capacity permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

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

10. **Test Report:** In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.

RECORDKEEPING AND REPORTING REQUIREMENTS

11. **Recordkeeping:** Records of the amount of foam produced (pounds per hour) shall be maintained on file for a minimum of five (5) years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]

12. **Recordkeeping:** The owner/operator shall maintain monthly records of the following:

- a. Amount of all VOC containing products used (Gallons)
- b. VOC content of all VOC containing products (Pounds/Gallon)
- c. VOC Emissions (Tons/Month and Tons/Year)
- d. Insulation panels produced (linear feet/month)
- e. Amount of scrap and percentage of scrap that is grounded into dust.

Records shall be maintained for a minimum of five (5) years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]

13. **Quarterly Reports:** Quarterly reports shall be submitted to the Department describing the monthly usage of all VOC containing products; the VOC content of all products; the monthly total VOC emissions; and the amount of boards produced. The quarterly reports shall be submitted by the 15th day of the following month after the end of each quarter (January-March, April-June, July-September, and October-December). The final report, which is due by the 15th of January for the quarter October –December, shall include a synopsis of the preceding year.

[Rule 62-4.070(3), F.A.C.]

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SPECIFIC CONDITIONS:**COMPLIANCE MONITORING****14. Objectionable Odor Prohibited.**

No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

15. Excess Emissions: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

ADMINISTRATIVE**16. Revision(s):** Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.**17. A completed Application for Air Permit – Long Form** shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form and processing fee.

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


Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

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)

September 21, 2005
(Date)