



Florida Department of Environmental Protection

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Hunter Panels, LLC
388 Southeast Enterprise Ct.
Lake City, Florida 32025

Air Permit Number: 0230044-003-AF
Date of Issue:
Expiration Date:

Authorized Representative:
Mr. Gregory Ridilla

Renewal Federally Enforceable State Operation
Permit

PROJECT AND LOCATION

This is the air operation permit renewal, which authorizes operation of a polyisocyanurate foam insulating panel manufacturing operation for use in commercial and industrial roofing applications. The facility is located at 388 Southeast Enterprise Ct., Lake City, Columbia County, Florida. The Standard Industrial Classification No. is 3086 Plastics Foam Products (urethane and other foam products). The UTM coordinates are Zone 17, 347.010 km East; 3338.874 km N. Latitude: 30° 10' 18", Longitude: 82° 35' 20"

This final permit is organized by the following sections.

- 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, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to operate the facility in accordance with the conditions of this permit.

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

AIR OPERATION PERMIT

Draft

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

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package 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 Draft to the persons listed below.

Mr. Gregory Ridilla, Plant Manager, Hunter Panels, LLC. [email: ridilla@hpanels.com]
Mr. Scott Reddig, P.E. [email: sreddig@ptd.net]

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.

Draft

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

This facility manufactures polyisocyanurate foam insulating panels for use in commercial and industrial roofing applications. The design capacity of the foam board manufacturing line is 200 linear feet of insulating board per minute.

Operations at the facility include unloading and storage of polymeric diphenylmethane diisocyanate (PMDI), polyol (polyester resin), phosphate based flame retardant, potassium octoate, catalysts, and pentane; material blending; panel production; cutting; packaging; and product storage.

A liquid polyester resin (polyol) is combined with a flame retardant, potassium octoate, and catalysts in a blend tank. Pentane is used as an expanding or blowing agent and is injected at high pressure into the mixture. The mixture is then combined with liquid polymeric diphenylmethane diisocyanate (PMDI) which reacts exothermically to create a foam. While the foam is still liquid, it is poured onto a moving paper substrate at the Pour Table where a top sheet is added as it is drawn into a heated upper and lower conveyor (laminator oven). The foam adheres to both the substrate and top sheet, solidifies and becomes rigid.

Following the laminator oven, the rigid foam material is sent to the crosscut saw station where any foam material spreading beyond the substrate/top sheet dimensions is trimmed, and the sheet is cut into long 4-foot wide panels. The long panels are sent to the Gang saw station where additional cross-cutting reduces the panels to the desired lengths, typically 4 or 8 feet.

Approximately 50% of the available scrap foam board is cut into "footers" that are used to form skids for the finished product at the facility. This operation releases a percentage of the pentane in the foam board product.

The Pour table is a source of potential VOC (pentane) and HAP (MDI) emissions. These emissions are sent to an exhaust stack, which is designated as an Emission Point at the facility (EP01).

A 2.5 MMBtu Indirect fired air heater is designed to take plant process air through a two-stage drop out filter box and into a heat exchanger, where the air is heated and transferred back into the process by a system fan. The combustion system uses a natural gas-fired burner manufactured by Eclipse Combustion RM200. Ventilation hoods are installed on the laminator oven that collects VOC emissions before being ducted to a separate exhaust stack. The exhaust stack is designated as an Emission Point at the facility (EP02).

Particulate matter from the cutting operations (crosscut saw station and the gang saw station), are collected and ducted to an outside baghouse. The baghouse consists of a filter section mounted in a hopper separator. The lighter material passes through the filter bags and is returned to the atmosphere. The heavier material drops to the bottom of the hopper. The dirt and foam debris accumulating in the bottom of the hopper pass through an air lock and fall directly into a baler, that compacts the dust/foam material into bricks or bales. The bales are then conveyed into a dumpster for disposal. The baghouse is designated as an Emission Point at the facility.

VOC emissions (pentane) are also released from the cutting operations. These emissions are also emitted from the baghouse.

The following storage tanks are used at the facility to store raw materials used in the manufacturing process.

- (2) 27,000 gallon PMDI Tanks
- (2) 27,000 gallon Polyol Tanks
- (1) 16,000 gallon TCPP (phosphate based flame retardant) Tank
- (1) 16,000 gallon potassium octoate Tank
- (1) 25,000 gallon Pentane Tank

SECTION 1. GENERAL INFORMATION

Potential emissions from the PMDI, Polyol, TCCP flame retardant, and potassium octoate tanks are such that they meet the Generic Emissions Unit or Activity Exemption criteria in Rule 62-210.300(3)(b)1., F.A.C. The Pentane tank is maintained under pressure with a nitrogen blanket, and therefore has no emissions.

REGULATED EMISSIONS UNITS AFFECTED BY PROJECT:

Facility ID No. 0230044	
ID No.	Emission Unit Description
001	Foam Insulation Board Manufacturing
002	Board Cutting Operation

The applicant has stated in the Operation Permit Renewal application received July 12, 2010 that the hog mill which was previously used for grinding scrap foam into dust, and thereby releasing all of the pentane in the ground up scrap to the atmosphere, has been removed from the facility. Scrap material is no longer ground into dust at the facility.

EMISSIONS UNITS OR ACTIVITIES EXEMPT FROM AIR PERMITTING:

Current Rule Citation	Description of Activity
62-210.300(3)(a)9., F.A.C.	Space Heaters
62-210.300(3)(a)13., F.A.C.	Brazing, Soldering, Welding
62-210.300(3)(a)33., F.A.C.	Laminator Heater
62-210.300(3)(a)24., F.A.C.	Triethylene Glycol Parts Cleaning Unit
62-210.300(3)(b)1., F.A.C.	(2) PMDI Tanks (2) Polyol Tanks (1) TCCP Flame Retardant Tank (1) Potassium Octoate Tank (1) Baler (1) Cool Vent Operation

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.

The facility is a synthetic minor source of air pollution because operational limits assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year pursuant to Chapter 62-210, F.A.C.

The facility is considered to be an area source of Hazardous Air Pollutants (HAP) in that the potential HAP emissions of from the facility are 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.

SECTION 1. GENERAL INFORMATION

FOR INFORMATIONAL PURPOSES, POLLUTANT ESTIMATED EMISSIONS

The following tables (for informational purposes) contains estimated potential emissions either provided in previous air permit applications or in Department files, for all emission sources permitted to operate at this facility.

Pollutant	Storage Tanks				
	(2) 27,000 gallon PMDI	(2) 27,000 gallon Polyol	(1) 16,000 gallon TCPP	(1) 16,000 gallon Potassium Octoate	(1) 25,000 gallon Pentane
PM	---	---	---	---	---
CO	---	---	---	---	---
NO _x	---	---	---	---	---
VOC	2.3E-06 ¹	1.0E-06 ¹	0.042 ¹	5.5E-05 ¹	---
HAPs	2.3E-06 ¹	---	---	---	---

Pollutant	Foam Board Production & Footer Material				
	Foam Board	Cutting Operation	Footer Materials	Equipment Leaks	Natural Gas Burner
PM	---	0.33 ⁴	0.19 ⁵	---	0.08 ⁶
CO	---	---	---	---	0.90 ⁶
NO _x	---	---	---	---	1.1 ⁶
VOC	88.6		1.2	0.76 ²	0.06 ⁶
HAPs	1.5E-3 ³		---		---

Pollutant	Facility-Wide Potential Emissions
PM	0.52
CO	0.90
NO _x	1.1
VOC	90.66
HAPs	1.5E-03

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and telephone number of the District Office is: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/807-3300.
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; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and 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. Application for Non - Title V Permit: 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.]
8. The facility is classified as a synthetic non-Title V facility. Annual Operation Reports shall be submitted to the Department in accordance with Appendix C, Common Conditions, Condition No. 10. c.(1) of this permit.
[Rule 62-210.370, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

9. Prevention of Accidental Releases (Section 112(r) of CAA).

- a. As required by rule, inspection, or change in process the owner or operator shall submit a Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
- b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
- c. The owner or operator shall submit the required annual registration fee to the DCA upon initial submission of the RMP to the CEPPO RMP reporting center and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, FS, and Rule 9G-21, FAC.

Any required written reports, notification, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs
Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
Telephone: (850) 413-9921, FAX: (850) 488-1739

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

Any required reports to be sent to the National Response Center, should be sent to:

National Response Center
EPA Office of Solid Waste and Emergency Response
USEPA (5305 W) 401 M Street, SW
Washington, D.C. 20460
Telephone: 1-800-424-8802

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Foam Insulation Board Manufacturing

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
001	Foam Insulation Board Manufacturing EP 01: Pour Table Exhaust Stack (VOC emissions) EP 02: Laminator Exhaust Stack (VOC emissions)

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- 1. Permitted Capacity – Foam Insulation Board Production:** The maximum foam board production rate shall not exceed 58,830,000 pounds in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Permit No. 0230044-002-AF; Applicant request]
- 2. Permitted Capacity – Pentane Usage:** The maximum pentane usage rate shall not exceed 3,700,000 pounds in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Permit No. 0230044-002-AF; Applicant request]
- 3. Permitted Capacity – Footer Production:** The maximum quantity of Footers produced shall not exceed 50 percent of available scrap material. The estimated percentage of foam board available for scrap material is 1.3 percent, i.e. 764, 790 pounds in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Application No. 0230044-003-AF]
- 4. Hours of Operation:** This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.

[Rule 62-210.200(PTE), F.A.C.; Permit No. 0230044-002-AF]

EMISSION LIMITATIONS AND STANDARDS

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

- 5. Volatile Organic Compound (VOC) Emissions:** This emissions unit is subject to the facility-wide VOC emissions limit/cap established in Subsection C, Common Condition No. 1. of this permit.

[Rule 62-4.070(3) F.A.C.; Permit No. 0230044-002-AF]
- 6. This emissions unit is also subject to the Subsection C -Common Conditions of this permit.**

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Foam Insulation Board Manufacturing

WORK PRACTICE STANDARDS

7. 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:
- All material containing VOC/OS's shall be stored in closed containers and/ or in small automatic closing safety cans.
 - 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,
 - Immediately attend to all spills as appropriate.

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

TESTING REQUIREMENTS

8. Performance Test – VOC Emissions: A performance test for volatile organic compounds shall be conducted at each emission point (EP01 and EP02) every 5 years, prior to operation permit renewal during the federal fiscal year (October 1 – September 30). The reference test method for VOC shall be EPA Method 25A, as described at 40 CFR Part 60, Appendix A, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

[Rules 62-4.070, 62-297.310(7)(a)3., F.A.C.; , 62-297.401(25)(a), F.A.C.; Permit No. 0230044-002-AF; Application No. 0230044-003-AF]

NOTIFICATION, RECORDS AND REPORTS

9. Compliance Test Procedures & Notification. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rules 62-296.401(7)(c)2., and 62-297.310(7)(a)9., F.A.C.]

10. Compliance 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.

[Rules 62-296.401(7)(c)2., and 62-297.310(8), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Foam Insulation Board Manufacturing

11. Record Keeping: The owner or operator shall keep the following records onsite and shall be made available to the Department or for an inspector's onsite review upon request:

- Quantity of foam board produced (pounds per month and pounds/ any 12-month period)
- Amount of all VOC and hazardous air pollutants (HAP) containing process substances used (gallons)
- VOC content of all VOC containing products (Pounds/Gallon)
- HAP content of all HAP containing process substances used (pounds per gallon)
- VOC Emissions (Tons/Month and Tons/12-month period)
- Individual HAP emissions (pounds per month)
- Total HAP emissions (pounds per month)
- Pentane usage rate (pounds per month and pounds/any 12-month period)
- Quantity of scrap material generated (pounds/month and pounds/any 12-month period)
- Quantity of Footers produced (pounds per month and pounds/any 12-month period)
- All emission factors used in determining actual VOC emissions (i.e. percent pentane loss, etc.)

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

12. Record Retention: The owner or operator shall keep records as described by Specific Condition No. 11., for at least 5 years.

[Rule 62-210.370(2), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Board Cutting Operation

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
002	<p>Board Cutting Operations</p> <p>EP 01: Crosscut/Side Trim Saw EP 02: Gang Saw & Foot Saw</p> <p>Particulate matter emissions from the crosscut/side trim saw (EP 01), and the gang saw and the foot saw (EP 02) are controlled by a baghouse manufactured by Mikropul-Mikro Pulsaire. Performance tests for VOC emissions (pentane) are determined at each Emissions Point individually prior to being vented from the baghouse stack.</p> <p>Air Pollution Control Equipment:</p> <p>One (1) Mikropul-Mikro Pulsaire Model 224-10-TRW-A Baghouse</p> <p>Cleaning Method.....Pulse jet No. of Bags.....224 Bag Dimensions..... 4.5" by 12 foot long Bag Material.....16 oz. polyester (or equivalent) Total Area to Filter Media (sq. ft.).....3167 ft² Particulate Matter estimated control efficiency.....99.9%</p>

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.

[Rule 62-210.200(203), FAC,]

2. Permitted Capacity: The board cutting operations are limited by the maximum foam board production rate, i.e., a maximum not to exceed 58,830,000 pounds in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Rule 62-4.070, F.A.C.; Permit No. 0230044-002-AF]

AIR POLLUTION CONTROL EQUIPMENT

3. Baghouse: The permittee shall operate and maintain the baghouse to control particulate matter emissions and minimize opacity from the board cutting operations to achieve the emissions standards specified by this permit. The baghouse shall be maintained in good operating condition and be used at all times when the manufacturing line is operating.

[Rule 62-4.070, F.A.C.; Rule 62-4.160(2), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Board Cutting Operation

EMISSION LIMITATIONS AND STANDARDS

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

4. Volatile Organic Compound (VOC) Emissions: This emissions unit is subject to the facility-wide VOC emissions limit/cap established in Subsection C, Common Condition No. 1. of this permit.

[Rule 62-4.070(3) F.A.C.; Permit No. 0230044-002-AF]

5. This emissions unit is also subject to the Subsection C -Common Conditions of this permit.

TESTING REQUIREMENTS

6. Performance Test - VOC Emissions: A performance test for volatile organic compounds shall be conducted at each emission point (EP01 and EP02) every 5 years, prior to operation permit renewal during the federal fiscal year (October 1 - September 30). The reference test method for VOC shall be EPA Method 25A, as described at 40 CFR Part 60, Appendix A, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

[Rules 62-4.070, 62-297.310(7)(a)3., F.A.C.;, 62-297.401(25)(a), F.A.C.; Permit No. 0230044-002-AF; Application No. 0230044-003-AF]

NOTIFICATION, RECORDS AND REPORTS

7. Compliance Test Procedures & Notification. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rules 62-296.401(7)(c)2., and 62-297.310(7)(a)9., F.A.C.]

8. Compliance 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.

[Rules 62-296.401(7)(c)2., and 62-297.310(8), F.A.C.]

9. Record Keeping: The owner or operator shall keep the following records onsite and shall be made available to the Department or for an inspector's onsite review upon request:

- Quantity of foam board produced (pounds per month and pounds/ any 12-month period)
- Amount of all VOC and hazardous air pollutants (HAP) containing process substances used (gallons)
- VOC content of all VOC containing products (Pounds/Gallon)
- HAP content of all HAP containing process substances used (pounds per gallon)
- VOC Emissions (Tons/Month and Tons/12-month period)
- Individual HAP emissions (pounds per month)
- Total HAP emissions (pounds per month)

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Board Cutting Operation

Specific Condition No. 9 Continued:

- Pentane usage rate (pounds per month and pounds/any 12-month period)
- Quantity of scrap material generated (pounds/month and pounds/any 12-month period)
- Quantity of Footers produced (pounds per month and pounds/any 12-month period)
- All emission factors used in determining actual VOC emissions (i.e. percent pentane loss, etc.)

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

10. Record Retention: The owner or operator shall keep records as described by Specific Condition No. 9., for at least 5 years.

[Rule 62-210.370(2), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Common Conditions

This section of the permit addresses the following emissions units:

ID No.	Emission Unit Description
001	Foam Insulation Board Manufacturing EP 01: Pour Table Exhaust Stack (VOC emissions) EP 02: Laminator Exhaust Stack (VOC emissions)
002	Board Cutting Operations with baghouse EP 01: Crosscut/Side Trim Saw EP 02: Gang Saw & Foot Saw

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Facility Wide VOC Emissions: Emissions of volatile organic compounds (VOCs) shall not exceed 99.0 tons in any consecutive 12-month period.

VOC emissions shall be determined by using the emissions computing methodology in Rule 62-210.370(2), F.A.C., the EPA Method 25A performance testing results as required in Subsection A, Condition No. 8., actual foam board production, actual pentane usage, actual footer material production, estimated VOC emissions due to equipment leaks, and VOC storage tank emissions using the best available VOC emission factors.

[Rule 62-4.070(3) F.A.C.; Permit No. 0230044-002-AF]

2. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharge 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 Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9 upon Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.

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

NOTIFICATION, RECORDS AND REPORTS

3. Quarterly Reports: Quarterly reports shall be submitted to the Department describing the monthly usage of all VOC and HAP containing products; the VOC and HAP content of all products; the monthly total VOC and HAP emissions; the quantity of footer material produced, and the quantity of foam board produced. The reports shall include all emission calculations, assumptions, and emission factors. 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.; Permit No. 0230044-002-AF]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Common Conditions

TESTING REQUIREMENTS

4. 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 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.]



SECTION 4. APPENDICES

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit

"AO" identifies the permit as an Air Operation Permit

"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number for that county

"001" identifies the specific permit project number

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor source federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CAM: compliance assurance monitoring	MMBtu: million British thermal units
CEMS: continuous emissions monitoring system	MSDS: material safety data sheets
cfm: cubic feet per minute	MW: megawatt
CFR: Code of Federal Regulations	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
ESP: electrostatic precipitator (control system for reducing particulate matter)	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SIP: State Implementation Plan
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SO₂: sulfur dioxide
Hg: mercury	TPD: tons/day
I.D.: induced draft	TPH: tons per hour
ID: identification	TPY: tons per year
kPa: kilopascals	TRS: total reduced sulfur
lb: pound	
MACT: maximum achievable technology	

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these 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 403.987(6) and 403.722(5), F.S., 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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 not 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 permittee 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under 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.
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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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.

SECTION 4. APPENDIX B

General Conditions

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 403.111 and 403.73, F.S. 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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with 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:
 - a. Determination of Best Available Control Technology (**not applicable**);
 - b. Determination of Prevention of Significant Deterioration (**not applicable**); and
 - c. Compliance with New Source Performance Standards (**applicable**).
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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) 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 the 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.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority 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.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. 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. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. 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. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, yard operations, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c), F.A.C.]

SECTION 4. APPENDIX C

Common Conditions

RECORDS AND REPORTS

10. Emissions Computation and Reporting:

- a. *Applicability.* This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (2) *Continuous Emissions Monitoring System (CEMS).*
 - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or

SECTION 4. APPENDIX C

Common Conditions

- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Mass Balance Calculations.
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

SECTION 4. APPENDIX C

Common Conditions

- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate 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), F.A.C.]
2. **Applicable Test Procedures - Opacity Compliance Tests:** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
[Rule 62-297.310(4), F.A.C.]
3. **Determination of Process Variables:**
 - a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]
4. **Frequency of Compliance Tests:** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing.*
 1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.

SECTION 4. APPENDIX D
Common Testing Requirements

2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
3. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard.
4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- b. *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 pursuant to those rules is being violated, it shall 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), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information:
 - a. The type, location, and designation of the emissions unit tested.
 - b. The facility at which the emissions unit is located.
 - c. The owner or operator of the emissions unit.
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation.
 - g. The test procedures used.
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.

SECTION 4. APPENDIX D
Common Testing Requirements

A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Hunter Panels, LLC
388 Southeast Enterprise Ct.
Lake City, Florida 32025

Facility ID No. 0230044

PROJECT

Project No. 0230044-003-AF
Application for Federally Enforceable State Operation Permit Renewal

COUNTY

Columbia, Florida

PERMITTING AUTHORITY

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

November 29, 2010

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

I. APPLICATION INFORMATION

A. APPLICANT NAME AND ADDRESS

Hunter Panels, LLC
388 Southeast Enterprise Ct.
Lake City, Florida 32025

Authorized Representative:
Mr. Gregory Ridilla, Plant Manager

B. APPLICATION PROCESSING SCHEDULE

July 12, 2010	Received the application.
August 11, 2010	Requested additional information.
September 7, 2010	Received additional information; application complete.

C. Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

D. FACILITY DESCRIPTION AND LOCATION

Hunter Panels, LLC is a polyisocyanurate foam insulating panel manufacturing operation which is used in commercial and industrial roofing applications. The facility is located at 388 Southeast Enterprise Ct., Lake City, Columbia County, Florida. The Standard Industrial Classification No. is 3086 Plastics Foam Products (urethane and other foam products). The UTM coordinates are Zone 17, 347.010 km East; 3338.874 km N. Latitude: 30° 10' 18", Longitude: 82° 35' 20". This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The Department received the air permit application from the applicant on July 12, 2010 to renew the FESOP.

Facility Description

This facility manufactures polyisocyanurate foam insulating panels for use in commercial and industrial roofing applications. The design capacity of the foam board manufacturing line is 200 linear feet of insulating board per minute.

Operations at the facility include unloading and storage of polymeric diphenylmethane diisocyanate (PMDI), polyol (polyester resin), phosphate based flame retardant, potassium octoate, catalysts, and pentane; material blending; panel production; cutting; packaging; and product storage.

A liquid polyester resin (polyol) is combined with a flame retardant, potassium octoate, and catalysts in a blend tank. Pentane is used as an expanding or blowing agent and is injected at high pressure into the mixture. The mixture is then combined with liquid polymeric diphenylmethane diisocyanate (PMDI) which reacts exothermically to create a foam. While the foam is still liquid, it is poured onto a moving paper substrate at the Pour Table where a top sheet is added as it is drawn into a heated upper and lower conveyor (laminator oven). The foam adheres to both the substrate and top sheet, solidifies and becomes rigid.

Following the laminator oven, the rigid foam material is sent to the crosscut saw station where any foam material spreading beyond the substrate/top sheet dimensions is trimmed, and the sheet is cut into long 4-foot wide panels. The long panels are sent to the Gang saw station where additional cross-cutting reduces the panels to the desired lengths, typically 4 or 8 feet.

Approximately 50% of the available scrap foam board is cut into "footers" that are used to form skids for the finished product at the facility. This operation releases a percentage of the pentane in the foam board product.

The Pour table is a source of potential VOC (pentane) and HAP (MDI) emissions. These emissions are sent to an exhaust stack, which is designated as an Emission Point at the facility (EP01).

A 2.5 MMBtu Indirect fired air heater is designed to take plant process air through a two-stage drop out filter box and into a heat exchanger, where the air is heated and transferred back into the process by a system fan. The combustion system uses a natural gas-fired burner manufactured by Eclipse Combustion RM200. Ventilation hoods are installed on the laminator oven that collects VOC emissions before being ducted to a separate exhaust stack. The exhaust stack is designated as an Emission Point at the facility (EP02).

Particulate matter from the cutting operations (crosscut saw station and the gang saw station), are collected and ducted to an outside baghouse. The baghouse consists of a filter section mounted in a hopper separator. The lighter material passes through the filter bags and is returned to the atmosphere. The heavier material drops to the bottom of the hopper. The dirt and foam debris accumulating in the bottom of the hopper pass through an air lock and fall directly into a baler, that compacts the dust/foam material

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

into bricks or bales. The bales are then conveyed into a dumpster for disposal. The baghouse is designated as an Emission Point at the facility.

VOC emissions (pentane) are also released from the cutting operations. These emissions are also emitted from the baghouse.

E. AIR POLLUTION REGULATIONS

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

F. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

II. APPLICATION REVIEW

PSD Applicability

The facility is an existing minor source for PSD review. PSD applicability review is required if the potential emissions from the proposed project will exceed the PSD major stationary source thresholds itself. The project is not increasing emissions therefore the project is not subject to PSD preconstruction review.

Major Source of Air Pollution / Title V Source Applicability

The facility is a synthetic minor source of air pollution because operational limits assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year pursuant to Chapter 62-210, F.A.C.

The facility is considered to be an area source of Hazardous Air Pollutants (HAP) in that the potential HAP emissions of from the facility are 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.

Federal NESHAP Provisions

The NESHAP requirements of 40 CFR 61 are not applicable as the facility operations and/or equipment do not belong to a source category or subcategory for which a standard has been promulgated.

The MACT requirements of 40 CFR 63 are not applicable as the facility operations and/or equipment do not belong to a source category or subcategory for which a standard has been promulgated. The facility is not subject to 40 CFR 63 Subpart OOOOOO- National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources. Hunter Panels does not produce a polyurethane foam.

The triethylene glycol parts cleaning unit is not subject to the applicability of 40 CFR 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Federal NSPS Provisions

The NSPS requirements of 40 CFR 60 are not applicable as the facility operations and/or equipment do not belong to a source category or subcategory for which a standard has been promulgated.

State Rule Applicability

The facility is regulated under Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards.

A. REGULATED EMISSION UNITS:

Existing:

Facility ID No. 0230044	
ID No.	Emission Unit Description
001	Foam Insulation Board Manufacturing
002	Board Cutting Operation

B. PROCESS FACTORS

In the previously issued permits, the facility has established the following federally enforceable limitations:

- Maximum of 200 linear feet of board per minute,
- Maximum foam board production rate limit of 58,830,000 pounds per year,
- Maximum pentane usage rate of 3,700,000 pounds per year,
- The amount of scrap and percentage of scrap that is ground into dust is limited to no more than 10% of the amount of scrap produced.

It was not clear from the previous permits how the maximum linear board production was used to determine actual emissions from the facility. In the additional information response received on September 7, 2010, the applicant confirmed that the design capacity of the production line is limited to a maximum of 200 linear feet per minute. However, the applicant also confirmed that the linear footage was not used as a parameter to determine facility emissions. The linear footage will be therefore removed from the permit.

The applicant stated in the renewal application received on July 12, 2010 that the hog mill which was previously used for grinding scrap foam into dust has been removed from the facility, and that scrap material is no longer ground into dust. As such, the limitation on the amount of scrap and the percentage that can be ground into dust will be removed from the permit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

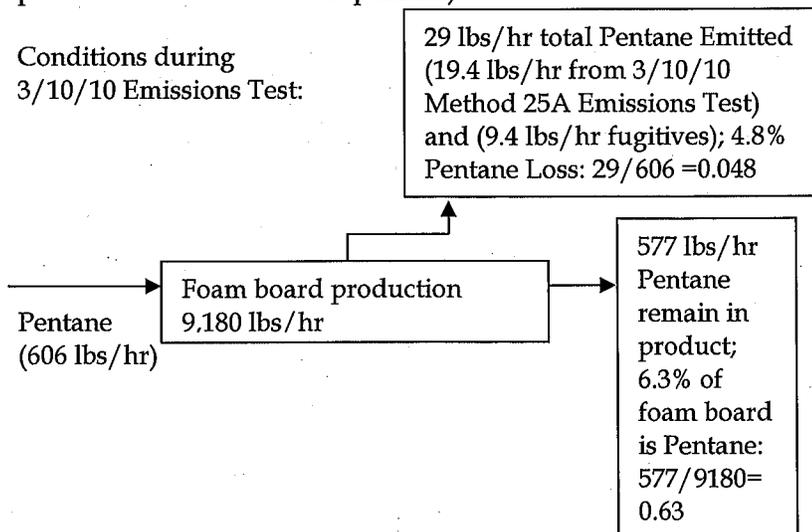
Both the maximum foam board production and pentane usage rates will remain in the permit, as a portion of the potential VOC emissions were based on these values. The facility's estimation of the potential VOC emissions also included pentane emission losses due to the production of footers. The facility has stated in previous permits and the additional information response dated September 7, 2010, that of the scrap material no more than 50 percent will be made into footers. Therefore, this percentage and the maximum quantity of available scrap material will be limited in the permit. The remaining scrap material is sent to a landfill in whole form.

The potential VOC emissions from the production of foam board are determined from the amount of pentane emitted during the production process and the amount emitted during the cutting of the board to make footer material.

Emissions of pentane occur primarily at four points along the production line: the pour table where the chemicals are poured on top of a moving substrate, the laminator, the side trim/crosscut station, and the gang saw station. Emissions from the pour table and the laminator are each directed through a separate stack to the atmosphere. Emissions from the two cutting stations are combined into a single exhaust for the dust collection system. Prior permits required an annual EPA Method 25A emissions test at each of the four points. The most recent was conducted on March 10, 2010. From this testing, the total stack emission rate of pentane was 19.6 pounds per hour. Pentane emissions not captured by the exhaust stacks are emitted as fugitive emissions from the facility. The initial construction permit application estimated the capture efficiency as 80 percent. The facility conducted a capture efficiency test on December 21, 2004 at the Hunter Panels facility in Franklin Park, Illinois, which resulted in a capture efficiency of 87.5%. Fugitive emissions during the March 10, 2010 test were determined to be 9.4 pounds per hour, for a total of 29.1 pounds per hour of pentane being emitted. The usage rate of pentane during the test was 606 pounds per hour, resulting in an estimated pentane percentage loss of 4.8% (Pentane stack emissions rate is 19.6 pounds per hour, the fugitive emissions rate is 9.4 pounds per hour = 29.1 pounds per hour total. 29.1 pounds per hour is 4.8% of the 606 pounds per hour pentane usage rate during emissions test).

The production rate of foam board during the emissions testing was 9180 pounds per hour. From the quantity of pentane used to make the foam board minus the amount of pentane emitted during the process, the amount of pentane that remains in the foam board can be determined (606 pounds per hour pentane usage - 29 pounds per hour emitted in process = 577 pounds per hour of pentane that remains in the foam board product). Therefore 6.3% of the foam board product weight is due to pentane (577 pounds per hour pentane in product / 9180 pound per hour foam board production = 6.3 percent of the foam board is pentane).

Conditions during
3/10/10 Emissions Test:



TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The potential emissions from foam board production are calculated as follows:

3,700,000 pounds of pentane/yr x 4.8% Pentane loss x 1 ton/2000 lbs = 88.6 tons/yr of Pentane emitted.

Pentane is also emitted during the cutting of the board into footer material. Previous permit applications have stated that approximately 1.3 percent of the foam board that is produced is used to make scrap material. During the cutting of the footer material, approximately 10% of the pentane in the foam board is released.

Potential emissions from this operation calculated as follows:

58,830,000 pounds /year of foam board production x 6.3% of the foam board is Pentane x 1.3% of the foam board is available as scrap material x 50% of the scrap material becomes footers x 10% Pentane is released during the making of footers x 1 ton/2000 pounds = 1.2 tons /year of Pentane emitted.

Total Pentane emissions from foam board and footer material production= 88.6 + 1.2 = 89.8 tons per year

The facility estimated fugitive pentane emissions due to equipment leaks in the initial construction permit application as less than 1 ton per year (refer to Attachment 9 of initial construction permit application).

The storage tanks located onsite are additional sources of VOC and HAP emissions. The applicant determined potential emissions using the Tanks program in the initial construction permit application received January 20, 2004.

Potential emissions from the PMDI, Polyol, TCCP flame retardant, and potassium octoate tanks are such that they meet the Generic Emissions Unit or Activity Exemption criteria in Rule 62-210.300(3)(b)1., F.A.C. The Pentane tank is maintained under pressure with a nitrogen blanket, and therefore has no emissions.

Particulate matter emissions are generated from the cutting operations of foam board production. The particulate matter is routed to a baghouse for control prior to release into the atmosphere.

The applicant doesn't appear to have estimated the potential emissions from the operation of the laminator heater in the initial construction permit application. The Department has estimated the criteria air pollutant emissions factors using AP-42, Section 1.4, Natural Gas Combustion. The potential to emit was calculated using the burner heat input capacity of 2.5 MMBtu/hr, the emission factors as described, and an operating schedule of 8,760 hours per year.

The initial construction permit application, lists the following sources and being exempt from air permitting pursuant to the Categorical and Generic Emission Unit of Activity Criteria:

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Former Rule Citation	Current Rule Citation	Description of Activity
62-210.300(3)(a)12.	62-210.300(3)(a)9.	Space Heaters
62-210.300(3)(a)16.	62-210.300(3)(a)13.	Brazing, Soldering, Welding
62-210.300(3)(a)21.	62-210.300(3)(a)33.	Laminator Heater
62-210.300(3)(a)33.	62-210.300(3)(a)24.	Triethylene Glycol Parts Cleaning Unit
62-210.300(3)(b)1.	62-210.300(3)(b)1.	(2) PMDI Tanks (2) Polyol Tanks (1) TCPP Flame Retardant Tank (1) Potassium Octoate Tank (1) Baler (1) Cool Vent Operation

In accordance with Rule 62-210.300(3)(a)24., F.A.C., non-halogenated solvent storage and cleaning operations can be exempt from air permitting, provided that such operations do not use any solvent containing any hazardous air pollutant. The definition of hazardous air pollutant, specifically Rule 62-210.200(155)96., F.A.C., includes glycol ethers, which includes mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol.

The applicant's consultant provided additional information on November 24, 2010 that clarified that the triethylene glycol used in the parts cleaning unit does not meet the Rule 62-210.200(155)96., F.A.C., definition of a HAP. The permit writer concurs with this submitted information.

Since the facility requested and operates under a FESOP, the potential emissions from the exempt sources should also be included in the facility-wide potential emissions from the facility. It doesn't appear that this was done for the space heaters, the brazing/soldering/welding operation, the triethylene glycol parts cleaning unit, the baler, and the cool vent operations.

The applicant requested in the application that the Department consider reducing the frequency of VOC and VE emissions testing in the renewed permit from once per federal fiscal year.

In accordance with Rule 62-297.310(7)(a)3., F.A.C., the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. This appears to be applicable to the frequency of testing required for VOC emissions at this facility. Furthermore, it appears from the annual Method 25A testing that the facility has conducted since the initial construction permit in until its most recent March 10, 2010 testing, that the determined percent loss of pentane during the production of foam board has been either less than or consistent with the 4.5% used to establish the potential VOC emissions from foam board production in the initial construction permit.

The general visible emissions standard in Rule 62-296.320(4)(b), F.A.C. is considered to be a facility-wide limitation unless it is used in conjunction with the process weight table of Rule 62-296.320(4)(a), F.A.C. for a given emissions unit. Since the process weight table

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

has not been applied to Emissions Unit 001, the 20% opacity limitation will be applied on a facility-wide basis in the future permit. The facility will not be required to perform a visible emissions compliance test to demonstrate compliance with this limitation on an annual or prior to permit renewal basis. However, the Department may require the owner or operator to perform a visible emissions compliance test in accordance with Rule 62-297.310(7)(b), F.A.C. – Special Compliance Tests.

Because these changes constitute a material change from the existing permit, a publication of a Public Notice will be required in accordance with Rule 62-210.300(2)(b)b., F.A.C.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. ESTIMATED POLLUTANT EMISSIONS

Emissions from the process consist primarily of Pentane (VOC) and particulate matter. Additional emissions include the Hazardous Air Pollutant MDI (from the storage tank and foam board production), polyol, phosphate based flame retardant, and potassium octoate from storage tanks, and NO_x and CO from natural gas combustion in the burner.

The following tanks are used at the facility to store raw materials used in the manufacturing process.

- (2) 27,000 gallon PMDI Tanks
- (2) 27,000 gallon Polyol Tanks
- (1) 16,000 gallon TCPP (phosphate based flame retardant) Tank
- (1) 16,000 gallon potassium octoate Tank
- (1) 25,000 gallon Pentane Tank

Pollutant	Storage Tanks				Foam Board Production & Footer Material						Facility-Wide Potential Emissions
	(2) 27,000 gallon PMDI	(2) 27,000 gallon Polyol	(1) 16,000 gallon TCPP	(1) 16,000 gallon Potassium Octoate	(1) 25,000 gallon Pentane	Foam Board	Cutting Operation	Footer Materials	Equipment Leaks	Natural Gas Burner	
PM	---	---	---	---	---	---	0.33 ⁴	0.19 ⁵	---	0.08 ⁶	0.52
CO	---	---	---	---	---	---	---	---	---	0.90 ⁶	0.90
NO _x	---	---	---	---	---	---	---	---	---	1.1 ⁶	1.1
VOC	2.3E-06 ¹	1.0E-06 ¹	0.042 ¹	5.5E-05 ¹	---	88.6	---	1.2	0.76 ²	0.06 ⁶	90.66
HAPs	2.3E-06 ¹	---	---	---	---	1.5E-3 ³	---	---	---	---	1.5E-03

¹ Based on Potential Emissions as presented in initial construction permit application, Attachment 7: Tanks 4.0 Emissions Report.

² Based on Potential Emissions as presented in initial construction permit application, Attachment 9: Pentane Emissions from Equipment Leaks.

³ Based on Potential Emissions as presented in initial construction permit application, Attachment 10: MDI Process Emissions.

⁴ Based on Potential Emissions w/ Federally enforceable limitations as presented in initial construction permit application, Attachment 11: Particulate Emissions Calculations. Particulate emissions from loading edge trimming and loading crosscut with baghouse efficiency.

⁵ Based on Potential Emissions w/ Federally enforceable limitations as presented in initial construction permit application, Attachment 11: Particulate Emissions Calculations.

⁶ Determined by FDEP (not in initial construction permit application), from AP-42, Table 1.4-1, Small Boiler (<100 MMBtu/hr) uncontrolled; Table 1.4.-2; 2.5 MMBtu/hr burner, 1020 Btu/scf.

III. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Additional details of this analysis may be obtained by contacting Rita Felton-Smith by phone at (904) 807-3237, by email at Rita.Felton-Smith@dep.state.fl.us , or by mail at the Department's Northeast District Office, 7825 Baymeadows Way, Suite B-200, Jacksonville, FL 32256-7590.