



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

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

Air Permit No. 0230044-004-AF
Federally Enforceable State Operation Permit

Authorized Representative:

Mr. Michael Varga, Plant Manager

Columbia County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of Hunter Panels, LLC, which is a polyisocyanurate foam insulating panel manufacturing operation for use in commercial and industrial roofing applications (Standard Industrial Classification No. 3086). This project is a permit renewal. The facility is located in Columbia County at 388 Southeast Enterprise Ct., Lake City, Florida. The UTM coordinates are Zone 17, 347.010 kilometers (km) East, and 3338.874 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility-wide Conditions); Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 5 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if

FINAL PERMIT

known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

0230044-004-AF Effective Date: November 13, 2015

Renewal Application Due Date: September 14, 2020

Expiration Date: November 13, 2020

Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.
Permitting Program Administrator

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that the Final Air Permit package (including the Final Determination and Final Permit), and all copies were sent before the close of business on November 13, 2015, to the listed persons.

Mr. Michael Varga, Plant Manager, Hunter Panels, LLC (Michael.varga@carlislesyntec.com)



Clerk

November 13, 2015
Date

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Existing Facility

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.

Foam board is cut into “footers” that are used to form skids for the finished product at the facility. Each footer is approximately 0.1736 cubic feet. Three footers are required to support each 8 foot long foam unit (bundle) and two footers are required to support each 4 foot long bundle. 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 and 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

SECTION 1. GENERAL INFORMATION

(1) 25,000 gallon Pentane Tank

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.

The existing facility consists of the following emissions units.

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

Emission 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

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>State Rule Citations</i>	
Rule 62-210.300, F.A.C., Permits Required	001, 002
Rule 62-296.320, F.A.C.	001, 002

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 62-213, 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Permitting Program, of the Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office, Permitting Program. The Permitting Authority's telephone number is (904) 256-1700.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and 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, 62-213, 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: The permittee shall notify the Compliance Authority upon commencement of construction. 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. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department.
[Rule 62-4.090, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

8. Annual Operating Report (AOR). The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

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

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

SECTION 3. FACILITY-WIDE CONDITIONS

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. A.6., the EPA Method 25A performance testing results as required in Subsection B, Condition No. B.5., 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; Permit No. 0230044-003-AF]

2. 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), F.A.C.]

3. General Visible Emissions Standard. 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), F.A.C.]

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 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, unless the Department obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the Department in accordance with the provisions of subsection 62-297.310(10), F.A.C.

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

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Foam Insulation Board Manufacturing, Emissions Unit 001

This section of the permit addresses the following emissions unit.

Emissions Unit Number	Brief Description
001	<p>Foam Insulation Board Manufacturing</p> <p>EP 01: Pour Table Exhaust Stack</p> <p><i>Stack Parameters:</i> Exhaust gas exits at approximately 85 °F with a volumetric flow rate of 1,671 acfm through a single stack that is approximately 1.42 feet in diameter and 29 feet above ground level.</p> <p>EP 02: Laminator Exhaust Stack</p> <p><i>Stack Parameters:</i> Exhaust gas exits at approximately 85 °F with a volumetric flow rate of 1,671 acfm through a single stack that is approximately 1.42 feet in diameter and 29 feet above ground level.</p>

{Permitting note(s): This emissions unit is subject to Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards.}

PERFORMANCE RESTRICTIONS

A.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; Permit No. 0230044-003-AF; Title V Major Source Applicability Avoidance]

A.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; Permit No. 0230044-003-AF; Title V Major Source Applicability Avoidance]

A.3. Permitted Capacity – Footer Production: The maximum footer production rate shall not exceed 319,153 pounds in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Application No. 0230044-004-AF]

A.4. Restricted Operation: The hours of operation of are not limited (8,760 hours per year).

[Rule 62-210.200(PTE), F.A.C.; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

EMISSION STANDARDS

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

[Rule 62-4.070(3) F.A.C.; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Foam Insulation Board Manufacturing, Emissions Unit 001

TESTING REQUIREMENTS

A.6. Performance Test – VOC Emissions: A performance test for volatile organic compounds shall be conducted at each emission point (EP 01 and EP 02) prior to obtaining a renewed operation permit. 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. No other method may be used unless prior written approval is received from the Department.

[Rule 62-4.070, F.A.C.; Rule 62-297.310(8)(b)1., F.A.C.; Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

A.7. Test Requirements: 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.

[Rule 62-297.310(9), F.A.C.]

RECORDS AND REPORTS

A.8. 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)
- Quantity of 4 foot and 8 foot foam board units (bundles) produced (number per month and number/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)
- Pounds 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.)

{Permitting Note: Applicant determines the pounds of footers produced: Each footer is approximately 0.1736 cubic feet; two footers are required to support each 4 foot long bundle; three footers are required to support each 8 foot long bundle; 2 pounds/cubic feet average density of foam board material}

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

A.9. Record Retention: The owner or operator shall keep records as described by **Specific Condition No. A.8.**, for at least 5 years.

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

A.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.

[Rule 62-297.310(10), F.A.C.]

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Foam Insulation Board Manufacturing, Emissions Unit 001

- A.11. 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; Permit No. 0230004-003-AF]

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection B: Board Cutting Operations, Emissions Unit 002

This section of the permit addresses the following emissions unit.

Emissions Unit Number	Brief 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.</p> <p>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> <p><i>Stack Parameters:</i> Exhaust gas exits at approximately 85 °F with a volumetric flow rate of 29,000 acfm through a single stack that is approximately 6.2 feet in diameter and 47 feet above ground level.</p>

{Permitting note(s): This emissions unit is subject to Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards.

PERFORMANCE RESTRICTIONS

B.1. 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; Permit No. 0230044-003-AF; Title V Major Source Applicability Avoidance]

B.2. Restricted Operation: The hours of operation of are not limited (8,760 hours per year).

[Rule 62-210.200(PTE), F.A.C.; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

AIR POLLUTION CONTROL EQUIPMENT

B.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.]

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection B: Board Cutting Operations, Emissions Unit 002

EMISSION STANDARDS

B.4. Volatile Organic Compound (VOC) Emissions: This emissions unit is subject to the facility-wide VOC emissions limit/cap established in **Facility-Wide Condition No. 1.** of this permit.

[Rule 62-4.070(3) F.A.C.; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

TESTING REQUIREMENTS

B.5. Performance Test – VOC Emissions: A performance test for volatile organic compounds shall be conducted at each emission point (EP 01 and EP 02) prior to obtaining a renewed operation permit. . 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. No other method may be used unless prior written approval is received from the Department.

[[Rule 62-4.070, F.A.C.; Rule 62-297.310(8)(b)1., F.A.C.; Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60; Permit No. 0230044-002-AF; Permit No. 0230044-003-AF]

B.6. Test Requirements: 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.

[Rule 62-297.310(9), F.A.C.]

RECORDS AND REPORTS

B.7. 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)
- Quantity of 4 foot and 8 foot foam board units (bundles) produced (number per month and number/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)
- Pounds 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.)

{Permitting Note: Applicant determines the pounds of footers produced: Each footer is approximately 0.1736 cubic feet; two footers are required to support each 4 foot long bundle; three footers are required to support each 8 foot long bundle; 2 pounds/cubic feet average density of foam board material}

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

EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection B: Board Cutting Operations, Emissions Unit 002

- B.8. Record Retention:** The owner or operator shall keep records as described by **Specific Condition No. B.7.**, for at least 5 years.

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

- B.9. 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.

[Rule 62-297.310(10), F.A.C.]

- B.10. 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; Permit No. 0230004-003-AF]