# Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary


## FINAL PERMIT

**PERMITTEE**
The Euclid Chemical Company
1611 Gunn Highway
Odessa, FL 33556-5311

Authorized Representative:
Mr. Ken DeRocker, Vice President and General Manager

Air Permit No. 1010509-002-AC
Permit Expires: 09/30/2010
Site Name: Increte Systems, Inc.
Minor Air Construction Permit
Project Name: Installation of Dust Collection System

This is the final air construction permit, which authorizes the installation of a high efficiency dust collection system manufactured by Dover/MEI Modern Equipment Inc. to control emissions from Emission Unit (EU) Nos. 002, 003, 004, 005, and 006. The proposed work will be conducted at the Increte Systems, Inc. (Standard Industrial Classification No. 2899). The facility is located in Pasco County at 1611 Gunn Highway in Odessa, Florida. The UTM coordinates are Zone 17, 343.6 km East, and 3118.5 km North.

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 permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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 Hillsborough County, Florida

Mara Grace Nasca — October 30, 2009

Mara Grace Nasca — Effective Date
District Air Program Administrator
Southwest District

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 November 03, 2009 to the persons listed below.

Mr. Ken DeRocker, The Euclid Chemical Company (kderocker@increte.com)
Mr. Joseph L. Tessitore, P.E., Ecology and Environment Inc. (jtessitore@ene.com)

Clerk Stamp

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

Patricia Burkett — November 03, 2009

(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Increte Systems, Inc.

This facility is a decorative concrete systems product manufacturing facility. The facility consists of three (3) buildings with street addresses at 1611/1725/1733 Gunn Highway and manufactures decorative concrete systems that economically recreate the look of natural stone, wood, tile, brick, and pavers. The facility produces the following types of liquid and dry products packaged in retail and commercial quantities:

- Concrete Stains
- Chemical Stains
- Sealants
- Color Hardeners
- Color Releasers
- Retardants
- Grouts
- Admixtures
- Epoxy Coatings
- High Gloss Wax

The facility also makes molds called "stamps" or "liners" and texturing tools used with their products to create desired architectural textures and patterns.

Production operations conducted at the facility include receiving/storing raw materials, mechanical mixing of liquid organic and inorganic products, mechanical blending of dry inorganic products, packaging and labeling of liquid and dry products, producing texture molds (i.e., stamps and liners), preparing product samples, assembling proprietary mechanical mixing systems, and warehousing of finished products. The existing facility consists of the following emissions units.

Facility ID No. 1010509

| ID No. | Emission Unit Description |
|---|---|
| 001 | Solvent Based Stain Production |
| 002 | Cement Storage Silo No. 1 (northeast) |
| 003 | Cement Storage Silo No. 2 (southeast) |
| 004 | Sand Storage Silo No. 1 (northwest) |
| 005 | Sand Storage Silo No. 2 (southwest) |
| 006 | Weigh Hopper (w/ transfer pod) |
| 007 | Three (3) Receiving Bins (share a common Torit baghouse w/ EU No. 008) |
| 008 | Three (3) Mixers (share a common Torit baghouse w/ EU No. 007) |

### Project Description and Affected Emission Units

The purpose of this permit is to modify the facility configuration so EUs 002, 003, 004, 005, and 006 will be vented to a common high efficiency Dover/MEI Modern Equipment Inc. dust collection system (baghouse) with a 99.5% particulate matter removal efficiency.

This project will modify the following emissions units.

| Facility ID No. 1010509 | |
|---|---|
| ID No. | Emission Unit Description |
| 002 | Cement Storage Silo No. 1 (northeast) |
| 003 | Cement Storage Silo No. 2 (southeast) |
| 004 | Sand Storage Silo No. 1 (northwest) |
| 005 | Sand Storage Silo No. 2 (southwest) |
| 006 | Weigh Hopper (w/ transfer pod) |

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

**Exempt Emission Units/Activities**

The emissions from the following emission sources at this facility are deemed insignificant and exempt from permitting:

*Southernmost Facility Building (1611 Gunn Highway)*

- The Mold Shop, pursuant to Rule 62-210.300(3)(b)1., F.A.C., which includes the following:

  Master tools are constructed of batched-mixed two-part epoxy resin with plasticizer additive and inert solid filler.

  Molds are cast of polyurethane polymer produced as an elastomer for stamps and as flexible foam for liners. The polyurethane polymers are produced by feeding the two-part components from raw material totes into dedicated dispensers that mix the components and feed them into the master mold boxes where they react and cure into the desired shape.

  The Mold Shop's flexible foam production station is subject to the non-unit specific requirements of Title 40, Code of Federal Regulations (CFR), Part 63, Subpart OOOOOO – National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources and Title 40, CFR, Part 63, Subpart A – General Provisions.

- A mechanical assembly area for proprietary bulk concrete product mixing systems. [Rule 62-210.300(3)(b)1., F.A.C.]

- A small general maintenance shop for the facility. [Rule 62-210.300(3)(b)1., F.A.C.]

- The Sample Department, located outside the northwest corner of the building, which involves the casting, curing, staining, and sealing of sample panels (1 – 2 foot square) produced for sales demonstration purposes.

[Rule 62-210.300(3)(b)1., F.A.C.]

*Middle Facility Building (1725 Gunn Highway)*

- Water-based sealer production, located in the southeast quadrant of the building, which involves the blending of water based liquid on a batch basis using low-speed mixing tanks. Water is supplied to this process from the potable supply system to the property and the other raw materials are pumped or manually poured into the mixers for each individual batch. Once blended, the sealers are dispensed directly from the mixers into vendor-supplied product containers.
  [Rule 62-210.300(3)(b)1., F.A.C.]

*Northernmost Facility Building (1733 Gunn Highway)*

- The Slurry Department, located in the southwest quadrant of the building, which involves the blending of water-based liquid integral concrete colorant and concentrated liquid mulch stains. Water is supplied to this process from the potable supply system to the property and the other raw materials are manually added to the mixers for each individual batch. Once blended, the colorants and stains are dispensed directly from the mixers into vendor-supplied product containers.
  [Rule 62-210.300(3)(b)1., F.A.C.]

- The Acid Department, located in the northern most quadrant of the building, which involves the blending of muriatic acid (hydrochloric acid), based concrete stains. The acid is dispensed from an elevated tote into six (6) air actuated mixing tanks. Water and metal salt colorants are manually added to the tanks to specification and the batch is agitated and the finished stain is depensed directly into vendor supplied product containers.
  [Rule 62-210.300(3)(b)1., F.A.C.]

*Miscellaneous Activities*

- 6,000 gallon capacity Storage Tank (Blend 1). [Rule 62-210.300(3)(b)1., F.A.C.]
- 6,000 gallon capacity Storage Tank (Blend 3). [Rule 62-210.300(3)(b)1., F.A.C.]
- 6,000 gallon capacity Storage Tank (Solution Acrylic Tank). [Rule 62-210.300(3)(b)1., F.A.C.]
- Product Labeling. [Rule 62-210.300(3)(b)1., F.A.C.]
- Contractor product demonstration and training. [Rule 62-210.300(3)(b)1., F.A.C.]
- Sales Showroom. [Rule 62-210.300(3)(b)1., F.A.C.]
- Facility Maintenance. [Rule 62-210.300(3)(b)1., F.A.C.]
- Administrative Support. [Rule 62-210.300(3)(b)1., F.A.C.]

## 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.
- This facility is a natural minor source of air pollution.

**PERMIT HISTORY/AFFECTED PERMITS**

Modifies sections of Construction Permit No. 1010509-001-AC, which are associated with EU Nos. 002, 003, 004, 005, and 006.

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits to operate an emissions unit shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements;

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the 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: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Application for Non-Title V Air Operation Permit: This permit modifies control equipment of the permitted emissions unit(s) and authorizes initial operation to determine compliance with

Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. a copy of the most recent compliance test report(s) required by Specific Condition No. D.12., if not previously submitted; and

d. copies of the most recent two months of records/logs specified in Specific Condition No(s). A.2., B.2., and C.2.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

## A. EU No(s). 002- Cement Storage Silo No. 1 (northeast) and 003- Cement Storage Silo No. 2 (southeast)

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|---|---|
| 002 | Cement Storage Silo No. 1 (northeast) - This silo pneumatically receives cement from trucks at a maximum transfer rate of 10 tons/hr. and emissions are controlled by the common baghouse manufactured by Dover/MEI Modern Equipment, Inc. |
| 003 | Cement Storage Silo No. 2 (southeast) - This silo pneumatically receives cement from trucks at a maximum transfer rate of 10 tons/hr. and emissions are controlled by the common baghouse manufactured by Dover/MEI Modern Equipment, Inc. |

### PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: Both silos shall not receive more than a total combined amount of 24,295 tons of cement per any consecutive 12-month period and only one (1) silo should be loaded at a time.
[Rule 62-210.200(PTE), F.A.C.]

### RECORDS AND REPORTS

A.2. Recordkeeping Requirements: The permittee shall record the following:

A. For each silo: Record the following for each delivery of cement:

1. The Date, Facility ID No. (1010509), Emission Unit No. (i.e., 002 or 003), and Source Name (e.g., Cement Storage Silo No. 1);
2. The amount of cement received, in tons;
3. Start time of transferring the cement from the truck to the silo;
4. End time of transferring cement from the truck to the silo;
5. Total time of transferring cement from the truck to the silo; and
6. The actual transfer rate of cement from the truck to the silo, in tons/hr.

B. For both silos: Record the following monthly:

1. The Month/Year, Facility ID No. (1010509), Emission Unit Nos. 002 and 003, Source Names (Cement Storage Silo Nos. 1 and 2); and
2. The most recent consecutive 12-month total combined amount of cement received in tons.

[Rule 62-4.070(3), F.A.C. and 62-210.200(PTE), F.A.C.]

## B. EU No(s). 004- Sand Storage Silo No. 1 (northwest) and 005- Sand Storage Silo No. 2 (southwest)

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|---|---|
| 004 | Sand Storage Silo No. 1 (northwest) - This silo pneumatically receives sand from trucks at a maximum transfer rate of 16 tons/hr. and emissions are controlled by the common baghouse manufactured by Dover/MEI Modern Equipment, Inc. |
| 005 | Sand Storage Silo No. 2 (southwest) - This silo pneumatically receives sand from trucks at a maximum transfer rate of 16 tons/hr. and emissions are controlled by the common baghouse manufactured by Dover/MEI Modern Equipment, Inc. |

### PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: Both silos shall not receive more than a total combined amount of 48,662 tons of sand per any consecutive 12-month period and only one (1) silo should be loaded at a time.
[Rule 62-210.200(PTE), F.A.C.]

### RECORDS AND REPORTS

B.2. Recordkeeping Requirements: The permittee shall record the following:

A. For each silo: Record the following for each delivery of sand:

1. The Date, Facility ID No. (1010509), Emission Unit No. (i.e., 004 or 005), and Source Name (e.g., Sand Storage Silo No. 1);
2. The amount of sand received, in tons;
3. Start time of transferring the sand from the truck to the silo;
4. End time of transferring sand from the truck to the silo;
5. Total time of transferring sand from the truck to the silo; and
6. The actual transfer rate of sand from the truck to the silo, in tons/hr.

B. For both silos: Record the following monthly:

1. The Month/Year, Facility ID No. (1010509), Emission Unit Nos. 002 and 003, Source Names (Sand Storage Silo Nos. 1 and 2); and
2. The most recent consecutive 12-month total combined amount of sand received in tons.

[Rule 62-4.070(3), F.A.C. and 62-210.200(PTE), F.A.C.]

## C. Weigh Hopper (w/ transfer pod)

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|---|---|
| 006 | Weigh Hopper (w/ transfer pod) - The weigh hopper (w/transfer pod) receives cement and/or sand from the storage silos by a screw auger at a maximum daily average batch amount of 4,500 lbs./batch period, which is based on a typical 15 minute batch period (9.0 tons/hr.). Emissions from this weigh hopper are controlled by the common baghouse manufactured by Dover/MEI Modern Equipment, Inc. |

### PERFORMANCE RESTRICTIONS

C.1. Operational Limitation: The transfer rate of cement and/or sand from the four (4) storage silos shall not exceed a maximum daily average batch amount of 4,500 lbs. /batch period, which is based on a typical 15 minute batch period (9.0 tons/hr.).
[Rule 62-210.200(PTE), F.A.C.]

### RECORDS AND REPORTS

C.2. Daily Log: When this emission unit is operating, the permittee shall daily record the following:

A. The Date, Facility ID No. (1010509), Emission Unit No. 006, and the Source Name (Weigh Hopper w/transfer pod);

B. The total number of batches;

C. The total amount of material transferred, in lbs.; and

D. The daily average batch amount, in lbs. /batch.

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

## D. Common Conditions for EU Group No(s). 002, 003, 004, 005, and 006

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|---|---|
| 002 | Cement Storage Silo No. 1 (northeast) |
| 003 | Cement Storage Silo No. 2 (southeast) |
| 004 | Sand Storage Silo No. 1 (northwest) |
| 005 | Sand Storage Silo No. 2 (southwest) |
| 006 | Weigh Hopper (w/ transfer pod) |

### PERFORMANCE RESTRICTIONS

D.1. Operating Limitations: Only one (1) of the four (4) silos may receive material at a time.
[Rule 62-210.200(PTE), F.A.C.]

D.2. Operating Limitations: Only one (1) of the four (4) silos may receive material when the weigh hopper is operating.
[Rule 62-210.200(PTE), F.A.C.]

D.3. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

### EMISSIONS STANDARDS

D.4. Stack Emission Limitations: Emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity.
[Rule 62-296.414(1), F.A.C. ]

### TESTING REQUIREMENTS

D.5. Initial Compliance Testing: Within 30 days of commencing operation of the common baghouse, test the common baghouse for visible emissions when the weight hopper is operating and at the same time either Cement Storage Silo No. 1 or Cement Storage Silo No. 2 is receiving cement.

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

D.6. Compliance Testing After Initial Testing: During each federal fiscal year (October 1st to September 30th) test the common baghouse for visible emissions when the weight hopper is operating at the same time either Cement Storage Silo No. 1 or Cement Storage Silo No. 2 is receiving cement.
[Rule 62-296.414(4)(b), F.A.C.]

D.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. (Also see Specific Condition D.9.)
[Rule 62-297.310(7)(a)9., F.A.C.]

D.8. Test Method: Required tests shall be performed in accordance with the following reference method.

| EPA Method | Description of Method and Comments |
|---|---|
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources |

The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

D.9. Test Method and Procedures: All emission tests performed shall comply with the following requirements:

A. Each test shall be conducted by a certified observer and be a minimum of 30 minutes in duration, or if the operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last for the length of the normal process operation. The visible emission test observation period shall include the period which the highest opacity emissions can reasonably be expected to occur.

B. Visible emission tests of each silo shall be conducted:

1. While loading either Cement Storage Silo No. 1 or Cement Storage Silo No. 2 at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. Each test report shall state the actual silo loading rate during the emission test period and include a copy of the most recent month of records as required by Specific Condition Nos. A.2. through B.2., as appropriate.
*{Permitting Note: Each of the two (2) cement storage silos has a maximum loading rate of 10 tons/hr.}*

**and**

2. When the weigh hopper is operating within 90 - 100% of the maximum permitted capacity of 4,500 lbs./batch when transferring a typical blend of cement and sand. Each test report shall state the actual batch amount during the emission test period and a copy of the most recent month of records required by Specific Condition No. C.2. If it is impracticable to test at the maximum permitted capacity, an emission unit may be tested at less than the maximum permitted capacity; in this case,

subsequent emission unit operation is limited to 110 percent of the test rate (batch amount) 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 maximum permitted capacity. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested batch amount, plus 10%, but in no case shall the maximum permitted capacity of 4,500 lbs./batch when transferring a typical blend of cement and sand be exceeded.

[Rules 62-296.414, 62-297.310, 62-297.310(8), and 62-4.070(3), F.A.C.]

## NOTIFICATION REQUIREMENTS

D.10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

D.11. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the common baghouse, no later than five (5) business days after that date.
[Rule 62-4.070, F.A.C.]

## RECORDS AND REPORTS

D.12. 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. All test reports shall be submitted to the Compliance Authority within 45 days of testing.
[Rule 62-297.310(8), F.A.C.]

D.13. Records Retention: The records required by Specific Condition Nos. A.2., B.2., and C.2. shall be recorded in a permanent form suitable for inspection by the Department upon request. The records and any supporting information shall be retained at the facility for a minimum of three (3) years. Daily records shall be completed by the end of the third business day and monthly records shall be completed by the end of the following month.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]