ATTACHMENT No. 2

For AOC, L.L.C.

Permit Nos. 1050099-009-AO & 1050099-010-AC

Annual Operating Report Emission Calculation Information, Grove Scientific & Engineering Company letter dated April 18, 2000

GROVE
SCIENTIFIC & ENGINEERING

April 18, 2000

Mr. James L. McDonald
Permit Engineer
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

RECEIVED
APR 24 2000
Department of Environmental Protection
BY SOUTHWEST DISTRICT

RE: Operation Permit for AOC, LLC
1050099-003-AC

Dear Mr. McDonald:

AOC, LLC (AOC) operates a polyester resin plant at Lakeland under Permit Number 1050059-003-AC. Enclosed is the application for an operating permit. Hardcopies of the signature pages are included, and the Process Flow Diagrams are included as Supplement No. 1.

Most of the facility modifications permitted by 1050099-003-AC have been completed. (A stack test has been performed to verify compliance and the test report has previously been submitted.) However, 1050099-003-AC permits the construction of a fifth reactor and additional thinning tanks. Although not included in the current facility modifications, installation of this equipment is planned for the future. Therefore, AOC, LLC requests that the operation permit include the option for this additional work.

Addition of new resin products at the facility may increase the use of powder additives and potential emissions of PM and PM10. However, the potential increase in emissions has caused GSE to review PM and PM10 emission factors. The emission factor used for PM/PM10 emissions from powders, in the application for 1050099-001-AC, was taken from AP-42. That emission factor, for mixing pigments (solids) in paint manufacturing, is 20 lb powder/ton powder used (for 30101402) or 1%. This emission factor resulted in calculated potential emissions of approximately 9.8 TPY from powder usage for the 1999 AOR. GSE has observed plant operations and emissions at this facility for years and this level of calculated potential emissions appears to be too high. There are generally no visible emissions from the production building where the powders are added.

It should also be noted that powders in the resin represent less than 5% of the resin weight. This is much less than the amount of solids in paint, so a review of the paint manufacturing emission factor is warranted. Other industrial processes which use powders as additives use lower emission factors, such as ink manufacturing (2 lb/ton for SCC 30102005) and plastics production (0.8 lb/ton for SCC 30101899). Using the most conservative of these two numbers would lower the calculated potential PM emissions by a factor of 10.

GROVE SCIENTIFIC & ENGINEERING COMPANY
6140 EDGEWATER DRIVE ▪ SUITE F ▪ ORLANDO, FLORIDA 32810
PHONE (407) 298-2282 ▪ FAX (407) 290-9038 ▪ WEBSITE www.grovescientific.com

GSE requests that the PM and PM10 emissions limits remain unchanged, but requests a change in the method of calculating the potential PM and PM10 emissions from powder mixing operations. The calculation change would be a simple change in the emission factor from the very conservative 20 lb/ton to the more realistic, but still conservative, 2 lb/ton. The request for this calculation change is based on GSE's knowledge of the process.

One of the new product resins requires a new powder additive, magnesium silicate hydrate. An MSDS for this material is included as Supplement No. 2.

As we discussed on March 27, the permit application fee is $4750. A check for the fee is enclosed.

If you have any questions or comments, please call me at (407) 298-2282.

Sincerely,
Grove Scientific & Engineering Company

John M. Kasper

John M. Kasper, P.E.
Environmental/Mechanical Engineer

Cc: Martin McLeod, AOC, LLC

CERTIFIED MAIL RECEIPT NO. Z487061515