

Florida Department of Environmental Protection

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926

Ryan E. Matthews
Interim Secretary

PERMITTEE

Henry Company LLC
2701 State Road 60 West
Bartow FL 33830

Air Permit No. 1050283-012-AO
Air Operation Permit

Authorized Representative:
Mr. Jimmy Sellers, Plant Manager

Bartow Facility
Polk County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of the Henry Company LLC, Bartow Facility, which is a manufacturer and distributor of roof coatings, roofing cements and other protective coating products (Standard Industrial Classification No. 2952). This project is for the renewal of Operation Permit No. 1050283-011-AO. The facility is located in Polk County at 2701 State Road 60 West in Bartow, Florida. The UTM coordinates are Zone 17, 412.10 kilometers (km) East, and 3086.16 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements and Facility-wide Specific Conditions); Section 3 (Emissions Unit Specific Conditions); and 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.

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 District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-470-5700.

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, Agency_Clerk@dep.state.fl.us. 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 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

FINAL AIR OPERATION PERMIT

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.

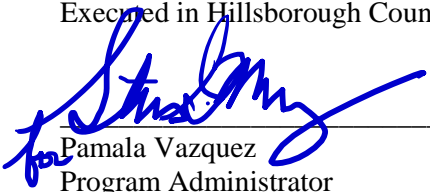
Mediation: Mediation is not available in this proceeding.

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.

1050283-012-AO Effective Date: April 27, 2017
Renewal Application Due Date: February 26, 2022
Expiration Date: April 27, 2022

Executed in Hillsborough County, Florida.



Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

FINAL AIR OPERATION PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this 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 the date indicated below to the following persons.

Jimmy Sellers, Henry Company LLC, JSellers@henry.com

Matt Stofko, Henry Company LLC, MStofko@henry.com

Danielle D. Henry, Florida DEP Southwest District, Danielle.D.Henry@dep.state.fl.us

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.



April 27, 2017

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Existing Facility

This facility manufactures and distributes roof coatings, roofing cements and other protective coating products. Liquid materials stored in various tanks are pumped to one of three mixing/blending plants inside one common building. All liquid raw materials arrive at the facility via tanker truck, drums, or totes and are pumped into their respective storage or mixing tanks. Limestone is pneumatically fed from a truck into a limestone storage silo which has a bin vent filter to control particulate emissions that are displaced when the silo is being filled. The silo feeds a hopper at its base that then feeds the batch tanks in the cutback asphalt plant. Other solids arrive via truck and are stored in the main building near the shipping area. A common product recovery baghouse is used to collect dry materials for reuse. There are baghouse pickup points from each of the mixing/blending plants. As a required work practice pursuant to Rule 62-296.320(4)(c), F.A.C., this baghouse also functions to prevent unconfined particulate emissions. It is not considered an emissions control device. The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
001	Cutback Plant
002	Limestone Storage Silo

EXEMPT EMISSION SOURCES/ACTIVITIES

Hot Oil Heater

The natural gas fired hot oil heater is used for heating the asphalt tanks in the tank farm and has a heat input of 2.1 MMBtu/hour.

[Rule 62-210.300(3)(a)33., F.A.C.]

Tank Farm

Identification	Capacity (gals)	Contents
1	20,000	Cutback Asphalt
2	20,000	Cutback Asphalt
3	20,000	Cutback Asphalt
4	20,000	Mineral Spirits
5	20,000	Hot Asphalt
6	20,000	Hot Asphalt
7	20,000	Mineral Spirits
9	20,000	Cutback Asphalt
10	20,000	Hot Asphalt
Water-based Latex	7,000	Water-based Latex
Water-based Latex	7,000	Water-based Latex
Hot Oil	350	Hot Oil
Hot Oil (overflow)	250	Hot Oil
Hot Oil	275	Hot Oil

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

SECTION 1. GENERAL INFORMATION

Small Tanks in the Cutback Asphalt Plant

There is one 550 gallon tank where cutback asphalt is mixed with other liquids to make invert coatings and one 800 gallon tank where cutback asphalt is mixed with other liquids to make primer. The final product is packaged for delivery.

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

White Plant

The White Plant receives liquid latex from one of two tanks in the tank farm into one of two 600-gallon mixing vats. Each vat has two covered openings. One opening (approximately 2 ft. X 2 ft.) allows dry raw materials such as clay or other solids/fillers to be added and blended with the latex. An active flexible product recovery baghouse pickup hose is attached to the other opening on the tank to create a vacuum on the tank to capture fugitive PM emissions. The flexible product recovery baghouse pickup hose exhausts to the main product recovery baghouse duct. After the raw materials are added to the tank, the raw material opening is closed, the flexible hose is removed and the tank connector is capped. Both of these openings are closed when not in use. The final product is packaged for delivery.

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

Asphalt Emulsion Plant

The Asphalt Emulsion Plant receives clay from a bucket elevator, which is mixed with water in one 5,826-gallon slurry tank. Asphalt and slurry are blended and transferred to one of two 5,826-gallon emulsion tanks, or to a 3,740-gallon Whippany tank. Other solids are transferred by hand to a 3 ft. X 4 ft. hooded opening where a screw conveyor feeds a bucket elevator that feeds the tanks. A product recovery baghouse pickup point is located on the hooded opening where the solids are added to capture any fugitive particulate matter associated with the solids transfer. A Torit mini scrubber, Model 6-6, captures particulate matter and VOCs from the emulsion and Whippany tanks. The slurry formed in the scrubber is transferred back into the process. The final product is packaged for delivery.

[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 does not operate 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.
- This facility is a synthetic non-Title V source for the pollutant volatile organic compounds. The throughput limitations in this permit will ensure that the facility's VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050283-011-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits to operate an emissions unit shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air@dep.state.fl.us

3. Appendices: The following Appendices are attached as a 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: 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS

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. To properly apply for an 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. copies of the most recent compliance test reports required by Specific Condition No. B.8., if not previously submitted;
 - d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.4. and B.9.
- [Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]
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.}

FACILITY-WIDE REQUIREMENTS

9. **General Standards: Volatile Organic Compound Emissions and/or Organic Solvent Emissions** - The permittee shall allow no person to 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. The following procedures shall be utilized to minimize pollutant emissions.
- a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
 - b. Perform mixing/blending operations with vessel lids in place.
 - c. Tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use.
 - d. Immediately confine and clean up VOC spills, and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1050283-003-AC]

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS

10. General Standards: Unconfined Particulates - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. At a minimum, the following precautions shall be taken by the permittee:

- a. application of water or chemicals to control emissions from construction, land clearing and any demolition or grading roads;
- b. application of water or other dust suppressants to unpaved roads, yards and open stock piles;
- c. removal of particulate matter from roads and other paved areas under Henry's control to prevent re-entrainment and from buildings or work areas to prevent particulate from becoming airborne;
- d. landscaping or planting of vegetation; and
- e. use of a fabric filter to contain, capture and vent particulate matter.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1050283-004-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU No 001 Cutback Plant

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	The Cutback Plant receives asphalt and mineral spirits from one of six tanks in a tank farm into one of three 2,500-gallon blending tanks. There is a mezzanine level over the blending tanks with a grated opening over each tank. Each tank also has a hooded opening station. Dry products such as limestone, cellulose or other solids/fillers are emptied from bags into the blending tanks through the grated opening and/or the hooded opening station. There is a product recovery baghouse pickup at each hooded station and in each of the blending tanks to capture fugitive particulate matter (PM) emissions resulting from the pouring and blending process. Because its primary function is to collect dry materials for reuse it is not considered an emissions control device. The final product is packaged for delivery.

PERFORMANCE RESTRICTIONS

- A.1. Permitted Capacity: The maximum throughput of cutback asphalt is 52,100 tons per any 12 consecutive month period.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050283-003-AC]
- A.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1050283-003-AC]
- A.3. Product Recovery Baghouse: In order to provide reasonable assurance that the product recovery baghouse is operating properly, visible emissions should not exceed 5 percent opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rule 62-210.650, F.A.C.; Construction Permit No. 1050283-003-AC]

RECORDS AND REPORTS

- A.4. Monthly Log for Cutback Asphalt Throughput and VOC and Xylene Emissions: In order to document compliance with Specific Condition No. A.1., monthly records shall be kept as follows:
- name, facility ID No., emission unit ID No., and description (e.g., Henry Company LLC, 1050283, EU 001, Cutback Plant);
 - month and year of record;
 - total throughput of cutback asphalt for the month (tons/month);
 - total throughput of cutback asphalt for the most recent 12 consecutive month period;
 - amount of solvents (Mineral Spirits) (lbs/month) used for the month;
 - total VOC and Xylene emissions* (tons) for the month; and
 - total VOC and Xylene emissions for the most recent 12 consecutive month period.

**(Permitting Note: VOC and HAP emissions are limited by the limit on cutback asphalt throughput. VOC and HAP recordkeeping is needed for reporting emissions on the annual operating report.)*

VOC and Xylene emission calculations should be based on the Henry Company LLC emission factor 0.0043 lb/lb solvent (Mineral Spirits). Monthly records must be completed by the end of the following month. They shall be maintained on-site for at least three (3) years in a form suitable for inspection and be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050283-003-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. EU 002 Limestone Storage Silo

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	This limestone storage silo has a maximum annual throughput rate of 8580 tons/year (TPY). Particulate emissions are controlled by a Best Engineering Model P04155 bin vent filter.

PERFORMANCE RESTRICTIONS

- B.1. Permitted Capacity: The maximum throughput of limestone processed through the cutback asphalt plant is 8,580 tons in any 12 consecutive month period.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050283-004-AC]
- B.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1050283-004-AC]

EMISSIONS STANDARDS

- B.3. Limestone Silo Bin Vent Filter: The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (limestone silo bin vent filter baghouse) operating properly. In order to provide reasonable assurance that the particulate matter emissions from filling the limestone silo are being effectively controlled, visible emissions from the bin vent filter exhaust vent shall not exceed 5% opacity.
[Rule 62-210.650, F.A.C.; Construction Permit No. 1050283-004-AC]

TESTING REQUIREMENTS

- B.4. Annual Compliance Tests: During each calendar year (January 1st to December 31st), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions.
[Rule 62-297.310(8)(a)1, F.A.C.]
- B.5. 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.]
- B.6. Operating Rate During Testing: Visible emissions testing must be conducted during silo loading at a minimum silo loading rate of 17.5 tons/hour*, which is the rate representative of normal operations.
[Rules 62-4.070(3) and 62-297.310(2), F.A.C.; Construction Permit No. 1050283-004-AC]
- *(Permitting Note: This rate is established for testing purposes only. It is not a permit limitation.)*
- B.7. Test Method: Required tests shall be performed in accordance with the following reference method:

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

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

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. EU 002 Limestone Storage Silo

RECORDS AND REPORTS

B.8. 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. For each test run, the report shall also indicate the actual transfer rate during the test period in tons/hour.
[Rule 62-297.310(10), F.A.C.]

B.9. Monthly Log for Limestone Throughput: In order to document compliance with Specific Condition No. B.1., monthly records shall be kept as follows:

- a. name, facility ID No., emission unit ID No., and description (e.g., Henry Company LLC, 1050283, EU 002, Limestone Storage Silo);
- b. month and year of record;
- c. total amount of limestone processed through the cutback asphalt plant for the month (tons/month);
and
- d. most recent 12 consecutive month rolling total of limestone processed (tons/12 consecutive months).

Monthly records must be completed by the end of the following month. They shall be maintained on-site for at least three (3) years in a form suitable for inspection and be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050283-004-AC]