# Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

## FINAL PERMIT

**PERMITTEE**

Polyglass USA, Inc.
1231 American Superior Blvd.
Winter Haven, FL 33880

Authorized Representative:
Mr. Jeff Barksdale, Plant Manager

Air Permit No. 1050384-007-AC
Permit Expires: 09/30/2016
Minor Air Construction Permit
Project: AC to Add Flexographic Printer

This is the final air construction permit to add a flexographic printer. The proposed work will be conducted at the Polyglass USA, Inc. facility (Standard Industrial Classification No. 2952). The facility is located in Polk County at 1231 American Superior Blvd. in Winter Haven, Florida. The UTM coordinates are Zone 17, 428.19 km East, and 3095.98 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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

for _____ October 20, 2015
Kelley M. Boatwright Effective Date
Permitting & Waste Cleanup 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 the date indicated below to the persons listed below.

Mr. Jeff Barksdale, Plant Manager, Polyglass USA, Inc. (jbarksdale@polyglass.com)

Mr. Michael Burrows, EHS Manager, Polyglass USA, Inc. (MBurrows@polyglass.com)

Mr. David A. Buff, P.E., Golder Associates, Inc. (DBuff@golder.com)

Mr. Steven Tafuni, Florida DEP Southwest District (steven.tafuni@dep.state.fl.us)

Ms. Danielle 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.

Linda Butler — October 20, 2015

(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Existing Facility

The facility produces asphalt rolled roofing products made from polyester or fiberglass mattes that are dip coated with the modified asphalt mixture. The existing facility consists of the following emissions units (EUs).

Facility ID No. 1050384

| EU ID No. | Emissions Unit Description |
|---|---|
| 001 | Asphalt Rolled Roofing Production Line |
| 002 | Filler Material Storage Silos Nos. 1, 2, and 3 (with baghouses that vent inside building) |

### Project Description and Affected/Proposed Emission Units

This project includes the creation of new emission unit EU 004 for installation and operation of a flexographic printer, which will be located within the production building. The printer, which will be used to print company graphics on reinforced polyester fabric up to 50 inches wide at a print speed of up to 500 feet per minute, is expected to increase potential emissions of volatile organic compound (VOC) by an estimated 40.6 tons per year (tpy). Additionally, in order to ensure that this facility will remain a non-Title V source, facility-wide conditions were added to limit the maximum VOC and HAP emissions from E.U. Nos. 001 and 004 combined. The facility-wide emission limits include a total VOC emission limit of 50.2 tons per year, a total HAP emission limit of 24.8 tons per any consecutive 12 month period, and an individual HAP emission limit of 9.8 tons per any consecutive 12 month period. This project will create/modify the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 001 | Asphalt Rolled Roofing Production Line |
| 004 | Flexographic Printer |

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

### Exempt Emission Sources/Activities

- Asphalt Cutback Blending and Compounding Process, and Elastomeric Compounding Process

  a. In the Asphalt Cutback Blending and Compounding Process, asphalt and mineral spirits are pumped from storage tanks at the facility (included in EU 001) into one common line and passed through an in-line static blender (a length of pipe with baffles to blend the materials). This Asphalt Cutback is then pumped into one of two (2) cool down tanks which are heated and insulated to maintain a temperature between 120-150 °F, and then to one of three (3) Asphalt Cutback run tanks. Asphalt Cutback is metered in specific quantities into any of four compounding mixers. At the mixers a variety of raw materials are added to produce specific products for roofing application (products include primers, coatings, adhesives, and mastics). The products are then packaged into a variety of containers by pumping or gravity feed depending on their viscosity, and palletized and wrapped for stock or sale.

  b. In the Elastomeric Compounding Process various raw materials are transported by pump or manually to a high dispersion mixer to produce specified products, which are normally water based. Using an air pump

the products are filtered and packaged into various containers, and then palletized and wrapped for stock or sale.

Both of the above mixing operations take place in a totally enclosed building. Total estimated emissions for the two processes are 0.65 TPY of VOC. These processes are exempt from permitting in accordance with the provisions of Rule 62-210.300(3)(b)(1), F.A.C. (Generic Emission Activity Exemption) based upon its potential to emit.

- Hot Oil Heater - An existing 2.5 MMBtu/hour natural gas fired Hot Oil Heater used to maintain the necessary temperatures in the asphalt storage tanks, transfer lines, mixers, and dip coating tank. This heater is exempt from permitting in accordance with the provisions of Rule 62-210.300(b)1., F.A.C. (Generic Emissions Unit Exemption) based on its potential to emit.
- Shrink Wrap Oven - A 0.4 MMBtu/hour natural gas fired oven where plastic wrap is tightly shrunk over pallets of finished roofing rolls. This oven is exempt from permitting in accordance with the provisions of Rule 62-210.300(b)1., F.A.C. (Generic Emissions Unit Exemption) based upon its potential to emit.
- Small Furnace - A 0.35 MMBtu/hour natural gas fired furnace used to burn residue off of steel mesh filters. This furnace is exempt from permitting in accordance with the provisions of Rule 62-210.300(b)1., F.A.C. (Generic Emissions Unit Exemption) based upon its potential to emit.

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC, Individual HAPs, Total HAPs, and $PM_{10}$.

## PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 1050384-005-AC.

## ADMINISTRATIVE REQUIREMENTS

**1.** Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air and Solid Waste Permitting Program. 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
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 shall be submitted to the above e-mail address and/or address.

**2.** Compliance Authority - The compliance authority for this project is 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
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air@dep.state.fl.us

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or address.

**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;

e. Appendix E. NSPS 40 CFR 60 Subpart A; and

f. Appendix F. NSPS 40 CFR 60 Subpart UU.

**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.** Annual Operating Report – On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

**8.** Application for Non-Title V Air Operation Permit – This permit authorizes construction of the permitted emissions unit(s) and 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. Commencing operation means setting into operation of any emissions unit for any purpose. 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.; and

c. copies of the most recent two months of records/logs specified in Specific Condition Nos. 11, A.12., A.13., A.14., B.3., and B.4.

The application shall be submitted to the Permitting Authority.

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

## FACILITY-WIDE SPECIFIC CONDITIONS

## EMISSIONS STANDARDS

**9.** VOC/HAP Emission Standards – The maximum emissions from E.U. Nos. 001 and 004 combined shall not exceed the following limits:

a. Individual HAP emissions shall not exceed 9.8 tons in any consecutive 12-month period.

b. Total HAPs emissions shall not exceed 24.8 tons in any consecutive 12-month period.

c. Total VOC emissions shall not exceed 50.2 tons in any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.; Application for Construction Permit 1050384-007-AC]

**10.** Unconfined Emission of Particulate Matter – No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition, or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:

a. Paving and maintenance of roads, parking areas, and yards.

b. Landscaping or planting of vegetation.

c. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C; Application for Construction Permit No. 1050384-007-AC]

**RECORDKEEPING REQUIREMENTS**

**11.** Monthly VOC/HAP Recordkeeping - To document compliance with the VOC and HAPs emission limitations of Specific Condition No. 9, the permittee shall maintain the following monthly VOC/HAP records which shall include at a minimum:

a. The facility name, month and year.

b. The Individual HAP emissions for EU No. 001 & 004 combined for the month and for the most recent consecutive 12-month period.

c. The Total HAPs emissions for EU No. 001 & 004 combined for the month and for the most recent consecutive 12-month period.

d. The VOC emissions for EU No. 001 & 004 combined for the month and for the most recent consecutive 12-month period.

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

**12.** Records Compilation and Retention - All daily records required by this permit shall be completed within ten (10) calendar days and all monthly records shall be completed by the 15th of the following month. All records required by this permit shall be maintained at the facility for at least three (3) years, and be made available to the Department for inspection upon request.
[Rule 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

## A. EU No. 001 – Asphalt Rolled Roofing Production Line

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 001 | Asphalt Rolled Roofing Production Line:<br>This emissions unit includes eight storage and reactor tanks used to store asphalt. The tank capacities are as follows:<br>– two 55,000 gallon capacity tanks,<br>– four 24,000 gallon capacity tanks,<br>– one 8,000 gallon capacity tank, and<br>– one 5,000 gallon capacity tank.<br><br>This emissions unit also includes two 24,000 gallon capacity tanks, which are used to store mineral spirits. Other low vapor pressure materials (resin/polymer modifiers) may also be stored in these tanks. (Note: The vapor pressure of all materials stored in these two tanks will be below the NSPS Subpart Kb threshold).<br><br>Asphalt is delivered to the facility by tanker trucks (primary method of delivery initially) or by rail, bottom unloaded, and hard-piped to the storage tanks. Asphalt, filler materials from the storage silos (EU No. 002), and polymer materials are transferred into and combined in four 4,000 gallon primary mixing tanks. Primary mixing tanks batch times are approximately 3.5 to 4 hours. Materials are transferred into the primary mixing tanks as follows:<br>– asphalt is transferred in via hard piping,<br>– filler materials are transferred in via a pneumatic system to a weigh hopper to a bucket elevator and enclosed horizontal screw conveyors, and<br>– polymer material are transferred in from super sack to one of four hoppers and then transferred pneumatically to one of two weigh hoppers, then to bucket elevators and enclosed horizontal screw conveyors.<br>*{Note: The three weigh hoppers are each controlled by a small dust collector that vents inside an enclosed building.}*<br><br>Material from the primary mixing tanks or the storage tanks are transferred, via hard piping, to two 6,000 gallon capacity secondary mixing tanks. The mixed material is then pumped to the coating tank of the coating line (saturator). The material is continuously circulated between the secondary mixing tanks and the coating line to maintain temperature and uniformity. Granular material can be applied to the roofing line as required by product specifications (by super sack or bags to a small hopper to a small conveyor to the production line).<br><br>In the asphalt coating line (saturator), polyester or fiberglass matte is dip coated with the modified asphalt mixture in a heated vat. Based on product specifications, coating materials, such as granules, sand, or a polyethylene film, can be applied to the front side of the matte after going through a dip coating tank. The back side of the matte may be given an adhesive treatment (modified asphalt) through a series of feed rollers. Based on product specifications, coating materials, such as granules, sand, or a polyethylene film, can also be applied to the back side of the matte. The resulting coated matte is cooled in a water bath and dried. The coated matte is then wound into rolls 1 meter wide and 10 to 20 meters long. Matte coating materials are handled inside the enclosed manufacturing building, with associated process equipment consisting of a receiving hopper and conveyor system, which transfers the material to the application area. |

| | |
|---|---|
| | *{Permitting Note: The method of manufacturing at this facility does not use asphalt blowing or spray saturation techniques.}*<br><br>Air emissions (primarily VOC and PM/PM10) from the asphalt storage tanks, the primary mix tanks (during normal operations), the secondary mix tanks, the dip coating tank, the coating material application area, the first section of the water bath, and the adhesive treatment application area are collected (via hooding for the non-tank equipment) and vented to the facility primary emission control device. This primary control device is a CECO Mist Collector System, Model CMC-16800 -C-P-F Fiber Bed Filter Mist Collector System (coalescing filter). In this control device, fiber bed filters are used to trap collect and remove liquids and soluble particulate suspended in a gas stream. They are also used to collect insoluble solids. Mist laden gases are passed through the fiber bed and cleaned gas exits the opposite side. The particles are trapped by the fibers as they try to pass through the fiber bed. The collected particles coalesce on the filter surface and drain by gravity. This control device has a design PM/PM10 removal efficiency of 99.5% and also controls VOC emissions with a 20-50% removal efficiency.<br><br>During loading of the filler materials (EU No. 002) to the primary mixing tanks, emissions from the mixing tanks are vented to a 1,000 acfm baghouse that vents inside of the building away from any building openings. *(Note: This interior baghouse exhaust is not considered an emission point to the ambient atmosphere and is exempt from air permitting).* |

## PERFORMANCE RESTRICTIONS

**A.1.** Federal Regulatory Requirements - This emission unit is subject to 40 CFR Part 60, Subpart UU - Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture, which is adopted by reference in Rule 62-204.800, F.A.C. Subpart UU applies to the saturator (dip coater) and each asphalt storage tank.

*{Permitting Note: This facility is also subject to 40 CFR 63, Subpart AAAAAAA – NESHAP for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing; however, this subpart had not been adopted by the State of Florida at the time this of this permit was issued.}*

[Rule 62-204.800(8), F.A.C.]

**A.2.** Permitted Capacity - The production rate shall not exceed the following limits:

| **Description** | **Hourly Production Rate*** (tons / hour) | **Annual Production Limit** (tons/consecutive 12- month period) |
|---|---|---|
| Production rate for smooth or mineral (granular) surfaced rolled roofing products | 14.2 | 85,410 |

*{*Permitting Note: The hourly production rate is included for compliance testing only. Demonstration of compliance with the hourly production rate during normal operation is not required. See Appendix D, Condition 3, for operation rate during testing requirements.}*

[Rule 62-210.200(Definition of Potential to Emit), F.A.C.]

**A.3.** Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

## EMISSIONS STANDARDS

**A.4.** Saturator Visible Emissions (VE) and Particulate Matter (PM) Emissions Standards – No owner or operator shall cause to be discharged into the atmosphere from any saturator (dip coater):

a. Particulate matter in excess of:

(1) 0.04 kg/Mg (0.08 lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced, or

(2) 0.04 kg/Mg (0.08 lb/ton) of saturated felt or smooth-surfaced roll roofing produced;

b. Exhaust gases with opacity greater than 20 percent; and

c. Any visible emissions (VE) from a saturator capture system for more than 20 percent of any period of consecutive valid observations totaling 60 minutes.

*{Permitting Note: a. and b. above apply to the facility's primary emission control device (coalescing filter) exhaust stack.}*

[Rule 62-204.800(8), F.A.C.; 40 CFR 60.472(a) (Subpart UU)]

**A.5.** Asphalt Storage Tank Visible Emissions (VE) Limitation - No owner or operator shall cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank(s) are ducted to a control device for a saturator,* the combined emissions shall meet the emission limit contained in Specific Condition No. A.4. above during the time the saturator control device is operating. At any other time the asphalt storage tank(s) must meet the opacity limit specified above for storage tanks.

*{* Permitting Note: The asphalt tanks are vented to the facility primary emission control device (coalescing filter) and under normal operation do not have any exhaust.}*

[Rule 62-204.800(8), F.A.C.; 40 CFR 60.472(c) (Subpart UU)]

## COMPLIANCE TESTING REQUIREMENTS

**A.6.** Compliance Testing - During the 12-month period prior to submittal of the application for renewal of the operation permit the coalescing filter outlet duct shall be tested to demonstrate compliance with the emissions standards for particulate matter (PM), and visible emissions and establish the volatile organic compound (VOC) emissions rate. The pound VOC/ton of product emission rate established by this test shall be used, in conjunction with production records, to calculate VOC tons/month emission rates required by Specific Condition No. A.13.
[Rules 62-4.070(3) and 62-297.310(8)(b), F.A.C.; 40 CFR 60.8(a) (Subpart A)]

**A.7.** Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

**A.8.** Compliance Test Methods

a. Required compliance tests shall be performed in accordance with the following reference methods.

| Methods | Description of Method and Comments |
|---|---|
| 1, 2, 3 or 3A, and 4 | Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content |
| 5A | Determination Of Particulate Matter Emissions from The Asphalt Processing and Asphalt Roofing Industry |
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources *(minimum 30 minutes duration)* |
| 22 | Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares |
| 25 | Determination of Total Gaseous Nonmethane Organic Emissions as Carbon |
| 25A | Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer |

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.

b. Saturator PM and VE Compliance Testing Requirements – To demonstrate compliance with the particulate matter and visible emissions standards of Specific Condition No. A.4., compliance testing shall be performed as specified in 40 CFR 60.474 (Subpart UU).

*{Permitting Note: Applicable requirements include 40 CFR 60.474(a), (b), (c)(1), (c)(2), (c)(3), (c)(5) and (d).}*

c. Volatile Organic Compound (VOC) Compliance Testing Requirements – Compliance testing shall be performed using EPA Method 25 or 25A. Method 25A may be used if the outlet concentration is less than 50 ppmv as carbon. If Method 25A is chosen as the test method, and the outlet concentration is greater than or equal to 50 ppmv, the test must be repeated, using Method 25.

[Rules 62-204.800, F.A.C.; 40 CFR 60.8 (Subpart A); 40 CFR 60.474 (Subpart UU); and Appendix A of 40 CFR 60]

**MONITORING REQUIREMENTS**

**A.9.** Coalescing Filter Operating Parameters - In order to insure proper operation of facility primary emission control device (coalescing filter), the coalescing filter shall be operated within the following parameters:

a. Main Filter Gas Temperature - The temperature of the main filter section (identified as “Outlet” temperature in facility monitoring and recordkeeping) shall not exceed 120 °F, except for a period not to exceed 15 minutes while the evaporative cooling system brings the temperature back into range.

b. Pressure Drop - The pressure drop across the main filter shall be maintained within the range shown below (as established by the manufacturer and verified during operation of the facility):

(1) a minimum of 2 inches of H2O;

(2) a maximum of 20 inches of H2O*.

* Any pressure drop reading above 20 inches of H2O should be considered as an indicator that the filter should be replaced and will not be considered a violation if the filter is replaced (or the pressure drop is reduced to below 20 inches of H2O) within 3 days of the exceedance.

*{Permitting Note: Operating parameters were based on operation permit application dated December 2007 and Polyglass USA, Inc. response letter dated June 3, 2008}*

[Rules 62-4.070(3) and 62-210.650 (Circumvention), F.A.C.; 40 CFR 60.473 (Subpart UU)]

## NOTIFICATION REQUIREMENTS

**A.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(9), F.A.C.]

## RECORDKEEPING AND REPORTING REQUIREMENTS

**A.11.** Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. Additionally, the Coalescing Filter PM, VE, and VOC compliance test reports shall also include the following operating and control device data for the testing period (VE) or each test run (PM, VOC), as applicable:

a. description of operations taking place in emission sources controlled by this facility primary emission control device during the testing period;

b. description of product(s) being produced;

c. production rate (tons/hour);

d. coalescing filter operating parameter data:

(1) range of main filter (Outlet) gas temperatures based on the continuous temperature monitoring above;

(2) range of pressure drops across the filter (minimum and maximum).

Failure to include the above data with the test report, or operating at conditions which do not reflect the normal operating conditions, may invalidate the test.

[Rules 62-297.310(10), F.A.C.; 40 CFR 60.474(e) (Subpart UU)]

**A.12.** Daily and Monthly Production Rate Recordkeeping – In order to document compliance with the production rate limitations of Specific Condition No. A.2., the permittee shall keep the following production records:

Daily Records:

a. date of the record;

b. daily production (tons) of all material processed on the production line; and

c. daily production line operating hours.

Monthly Records:

d. month and year of record;

e. monthly production (in tons); and

f. total production for the most recent 12 consecutive month period (tons).

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

**A.13.** Monthly VOC and HAPs Emissions

a. Monthly VOC Emissions - The permittee shall calculate and maintain the following monthly VOC emission records:

1) Facility Name, Emission Unit No., Month and Year.

2) The VOC emissions factor (in pound VOC/ton of product) determined based on the most recent compliance test. (See Specific Condition A.6.)

3) The calculated monthly VOC emission rate (in tons) using the following formula:

$$VOC\ Emissions\ (tons) = VOC\ E.F.\left(\frac{lb}{ton}\right) \times Monthly\ Production\ (tons) \div 2000$$

b. Monthly HAP Emissions - The permittee shall calculate and maintain the following monthly Individual HAP emission records:

1) Facility Name, Emission Unit No., Month and Year.

2) The Individual HAP name and emissions factor.

3) The calculated monthly individual HAP emissions rate (in tons) using the following formula:

$$Individual\ HAP\ Emissions\ (tons) = HAP\ E.F.\left(\frac{lb}{ton}\right) \times Monthly\ Production\ (tons) \div 2000$$

*{Note: Polycyclic aromatic hydrocarbons (PAH), which belongs to the category of compounds defined as Polycyclic Organic Matter, is the only individual HAP that will be emitted from this emissions unit. Based on information provided by the applicant, the emissions factor for this PAH is $8.6 \times 10^{-7}$ lb of PAH/lb of asphalt (or 0.00172 lb of PAH/ton of asphalt). Because PAH is the only HAP emitted, Total HAP are equal to the Individual HAP emissions.}*

[Rule 62-4.070(3), F.A.C.; Eastern Research Group, Inc.'s June 22, 2009's Memorandum titled, "Summary of Technical Analysis Used to Support Development of Area Source Standards for Asphalt Processing and Asphalt Roofing Manufacturing Facilities."]

**A.14.** Coalescing Filter Operating Parameter Recordkeeping - In order to document compliance with the operating requirements of Specific Condition No. A.9., the permittee shall keep the following records on the operating parameters of the facility primary emission control device (coalescing filter):

a. Coalescing Filter Main Filter Gas Temperature - The permittee shall keep records of the temperature of the gas in the main filter section of the control device (identified as the "Outlet" temperature in facility monitoring and recordkeeping).

b. Coalescing Filter Pressure Drop - The permittee shall record the pressure drop across the coalescing filter at least once per day.

[Rules 62-4.070(3), and 62-204.800 (8)(b), F.A.C.; 40 CFR 60.473(c) (Subpart UU)]

**A.15.** Coalescing Filter Main Filter Temperature Monitoring Recordkeeping – In accordance with 40 CFR 60.473(d), the facility is exempted from the quarterly excess emissions and monitoring systems performance reports required under 40 CFR 60.7(c). The owner/operator is required to record the operating temperature (main filter (Outlet) temperature) of the control device during the compliance tests, and include the results with the compliance test reports.
[Rules 62-4.070(3), and 62-204.800(8), F.A.C.; 40 CFR 60.473(d) and 60.474(e) (Subpart UU)]

**A.16.** VOC/HAP Documentation - Supporting documentation (SDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for all chemicals (including resin/polymer modifiers) stored at the facility, which includes sufficient information to determine emissions and compliance. Where credit is taken for recycled materials, documentation of reclaimed chemicals, such as during clean-up operations that use solvents, will use a mass balance method to determine usage (amount used for clean-up minus amount collected for disposal or recycle). These records shall be maintained at the facility and be made available to the Department for inspection upon request.
[Rule 62-4.070(3), F.A.C.]

## B. EU No. 004 – Flexographic Printer

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 004 | Flexographic Printer<br>This emissions unit will consists of a flexographic printer, which will be located within the production building and vented to the atmosphere via roof and wall vents.<br>The printer will be used to print product and company logos with a single color (black or blue) on reinforced polyester fabric up to 50 inches wide at a print speed of up to 500 feet per minute.<br>The flexographic printer will be a source of VOC and HAPs emissions. |

### PERFORMANCE RESTRICTIONS

**B.1.** Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

### EMISSION STANDARDS

*{Permitting Note: see Specific Condition No. 9.}*

### NOTIFICATION REQUIREMENTS

**B.2.** Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 004 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

### RECORDKEEPING REQUIREMENTS

**B.3.** Monthly VOC Recordkeeping – The permittee shall maintain monthly VOC records for EU No. 004 which shall contain, at a minimum, the following information.

a. The facility name, facility ID No., and E.U. No.

b. The month and year;

c. Total quantity of ink used for the month;

d. VOC content (lbs/gallon) of each VOC-containing material (e.g., inks, etc.) used for the month;

e. The total (calculated) VOC emissions (in tons) for the month.

[Rule 62-4.070(3), F.A.C.; Application for Construction Permit No. 1050384-007-AC]

**B.4**. Monthly HAP Recordkeeping – The permittee shall maintain monthly HAP records for EU No. 004, which shall contain, at a minimum, the following information.

a. The facility name, facility ID No., and emission unit ID No.

b. The month and year;

c. For emission unit E.U. No. 004, include the following information:

1) total quantity (gallons) of each HAP containing material (e.g., inks, etc.) used for the month;

2) the Individual HAP and Total HAPs content (lbs/gallon) of each HAP-containing material (e.g., inks, etc.) used for the month;

3) the total (calculated) emissions (in tons) for each Individual HAP and Total HAPs for the month.

[Rule 62-4.070(3), F.A.C.; Application for Construction Permit No. 1050384-007-AC]

**B.5.** VOC/HAP Documentation – Supporting documentation (e.g., example calculations, Safety Data Sheets (SDS), "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for monthly records, which includes sufficient information to determine VOC and HAP emissions, shall also be maintained. The use of purchases as a proxy for usage is not allowed for the monthly recordkeeping.
[Rule 62-4.070(3), F.A.C.; Application for Construction Permit No. 1050384-007-AC]