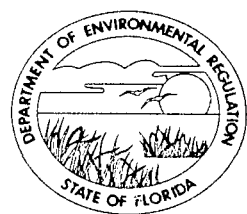


Brull

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

August 28, 1987

CERTIFIED MAIL - Return Receipt Requested

Mr. Doug Buchanan  
Plant Manager  
CIBA-GEIGY Corporation  
3550 N. W. 49th Street  
Miami, Florida 33142

Dear Mr. Buchanan:

Re: Amendment Requests to a Construction Permit  
No. AC 13-109080

The Department has received and reviewed your letters dated June 2 and July 21, 1987, which requested amendments to the above referenced construction permit. The Bureau agrees with the requests and the following shall be changed and added:

Specific Conditions

No. A.5.:

From: DER Method 5 shall be used to compliance test for particulate matter and DER Method 9 shall be used to compliance test for visible emissions. Compliance testing shall be in accordance with FAC Rule 17-2.700.

To: EPA Method 5 shall be used to compliance test for particulate matter and DER Method 9 shall be used to compliance test for visible emissions. Compliance testing shall be in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Nos. B.4. and C.4.:

From: A monitor for the temperature of the catalyst bed shall be required.

To: A monitor for the temperature of the thermal incinerator shall be required.

Nos. B.10. and C.10.:

From: Maximum capacity is 125 lb/hr VOC usage and based on processing a maximum of 10 units/blocks of material per hour.

To: Maximum capacity is 125 lbs/hr VOC usage and based on processing a maximum of 5 dips/purges of material per hour.

Mr. Douglas Buchanan  
Page 2  
August 28, 1987

No. D.1. NOTE:

From: Based on a maximum of 125 lb/hr/DPU VOC usage and 10 units/blocks of material processed per DPU.

To: Based on a maximum of 125 lbs/hr/DPU VOC usage and 5 dips/purges of material processed per DPU.

No. D.3.:

From: Maximum VOC capacity per DPU is 125 lb/hr (based on processing 10 units/blocks per hour per DPU).

To: Maximum VOC capacity per DPU is 125 lbs/hr (based on processing 5 dips/purges per hour per DPU).

No. D.9.:

From: Compliance test(s) for PM and VE shall be DER Method 5 and DER Method 9, respectively. Compliance testing shall be in accordance with FAC Rule 17-2.700.

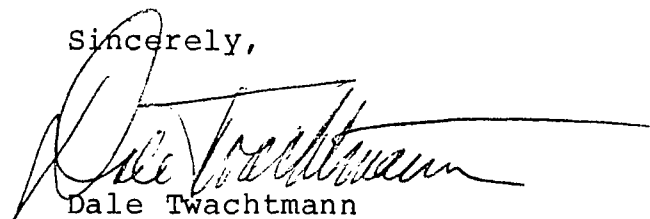
To: Compliance test(s) for PM and VE shall be EPA Method 5 and DER Method 9, respectively. Compliance testing shall be in accordance with FAC Rule 17-2.700 and 40 CFR 60, Appendix A.

Attachments to be Incorporated:

9. Mr. Douglas Buchanan's letter dated June 2, 1987, and received June 8, 1987.
10. Mr. Douglas Buchanan's letter and enclosures dated July 21, 1987, and received July 24, 1987.

This letter must be attached to your construction permit, No. AC 13-109080, and shall become a part of the permit.

Sincerely,



Dale Twachtmann  
Secretary

DT/bm

cc: S. Brooks  
P. Wong  
B. Pittman, Esq.

ATTACHMENT 9

Composite Materials Department  
Miami Plant

CIBA-GEIGY Corporation  
3550 N.W. 49th Street  
Miami, Florida 33142  
Telephone 305 633 9066

6-11-87  
Miami, FL  
CIBA-GEIGY

June 02, 1987

DER

JUN 8 1987

BAQM

C. H. Fancy, P.E.  
State of Florida  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, FL 32301-8241

Re: Permit No. AC-13-109080


Dear Mr. Fancy:

We request the following changes in the captioned permit in order to correct or clarify the information in the permit conditions.

1. Specific Condition No. A.5 should specify EPA Method No. 5 instead of DER Method No. 5.
2. Specific Condition No. B.4 should be deleted because the incinerator is thermal, not catalytic.
3. Specific Condition No. B.10 Processing rate is 5 dips/hour per "Dip Purge" Unit.

If you have further questions please feel free to call me.

Sincerely,



Doug Buchanan  
Site Manager

DB:AM:on

cc: Bruce Mitchell - DER - Tallahassee, FL  
Stephanie Brooks - DER - West Palm Beach, FL  
Patrick Wong - DERM - Dade County

FANCY  
JUNE 03, 1987

ATTACHMENT 10

Composite Materials Department  
Miami Plant

CIBA-GEIGY Corporation  
3550 N.W. 49th Street  
Miami, Florida 33142  
Telephone 305 633 9066

# CIBA-GEIGY

## DER

JUL 24 1987

## BAQM

July 21, 1987

Bruce Mitchell  
Dept. of Environmental Regulations  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, FL 32301-8241

SUBJECT: Permit No. AC 13-109080

Dear Mr. Mitchell:

The way the information was presented in the application for the subject permit leads to some confusion.

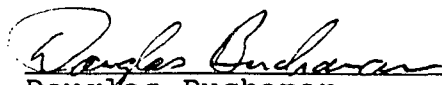
We wish the permit be revised in order to show the real operating conditions of the project. A clarification of the information follows:

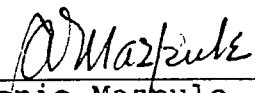
1. The maximum potential capacity of DPU #1 is 5 dip-purges per hour. The same design criterion is being used in the specifications for the second DPU. This rate, yet occasionally reached, cannot be sustained over a year because of the constraints of our production line.
2. The total VOC's usage at the completion of the project will be 250 lbs per hour. Therefore, the VOC's consumption associated with the operation of each DPU is 125 lbs/hr. The emissica levels are accurately shown on Section D.1 of the subject permit, and correspond with these values.

We apologize for the inconvenience of not furnishing the information more clearly.

Attached are the copies of the pages we feel should be changed.

Sincerely,

  
Douglas Buchanan  
Plant Manager

  
Antonio Mazpule, P.E.  
Project Engineer

DB:TM:sb

Encl.

cc: I. Goldman - D.E.R. - West Palm Beach  
P. Wong - D.E.R.M. - Miami, FL

Report: Bruce Mitchell 07/21/87

PERMITTEE:  
CIBA-GEIGY Corporation

Permit Number: AC 13-109080  
Expiration Date: May 31, 1987

SPECIFIC CONDITIONS:

4. The visible emissions limit from the curing ovens shall be less than 20 percent opacity.
5. <sup>EPA</sup> ~~DER~~ Method 5 shall be used to compliance test for particulate matter and DER Method 9 shall be used to compliance test for visible emissions. Compliance testing shall be in accordance with FAC Rule 17-2.700.

6. Objectionable odors shall not be allowed off plant property.

B. Dip and Purge (DPU) #1 and Associated Incinerator System

1. The first DPU and the associated incinerator system shall be constructed/installed, debugged, and compliance tested prior to September 1, 1986.
2. Upon completion of compliance testing, an existing uncontrolled dip and purge operation shall be immediately retired from service and dismantled, but prior to September 1, 1986.
3. The DPU shall be totally enclosed with a negative pressure maintained to avoid VOC emissions and to establish 100% (percent) capture efficiency. The pressure drop shall be demonstrated for the DPU to verify that negative pressure exists during each operation. Capture efficiency shall be determined using mass balance.

THERMAL INCINERATION

4. A monitor for the temperature of the ~~incinerator~~ ~~unit~~ shall be required.
5. The minimum VOC destruction efficiency for the incinerator shall be 95 percent, which means that at least 95 percent of the VOC, measured as total combustible carbon, will be oxidized to carbon dioxide and water. EPA Method 25, Appendix A, 40 CFR 60, shall be used to demonstrate the destruction efficiency.
6. Compliance tests shall be demonstrated while operating at maximum capacity.
7. Test(s) protocol shall be approved prior to the test(s) and shall be coordinated with the DER Southeast Florida District office and





