

Check Sheet

Company Name: LIN PAC PCASTICS

Permit Number: AC 28-187809

PSD Number: _____

Permit Engineer: _____

Application:

- ☒ Initial Application
- ☐ Incompleteness Letters
- ☐ Responses
- ☐ Waiver of Department Action
- ☐ Department Response
- ☐ Other

Cross References:

☐

☐

☐

Intent:

- ☒ Intent to Issue
- ☒ Notice of Intent to Issue
- ☒ Technical Evaluation
- ☐ BACT Determination
- ☒ Unsigned Permit

Correspondence with:

- ☐ EPA
- ☐ Park Services
- ☐ Other

☒ Proof of Publication

- ☐ Petitions - (Related to extensions, hearings, etc.)
- ☐ Waiver of Department Action
- ☐ Other

Final Determination:

- ☒ Final Determination
- ☐ Signed Permit
- ☐ BACT Determination
- ☐ Other

Post Permit Correspondence:

- ☒ Extensions/Amendments/Modifications
- ☐ Other

December 6, 1993



RECEIVED
ENVIRONMENTAL
ENGINEERING
CONSULTANTS, INC.

DEC - 7 1993

Division of Air
Resources Management

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Highlands County - AP
Lin Pac Plastics, Inc.
AC28-187809

12/16/93
Sent to Gary
Mair - FTM to
process -

Dear Mr. Fancy:

Currently Lin Pac Plastics, Inc. holds a construction permit to modify the existing facility in Sebring, Florida. This permit allows the blowing agent to be changed from Freon 22 to butane. It also allows for the addition of a fourth extruder and other equipment to increase the production capacity of the plant. The expiration date is December 31, 1993.

As of this date, the blowing agent has been changed to butane and some of the equipment discussed in the original application has been installed. Lin Pac Plastics was only able to install an extruder of half the requested size due to capital limitations. Recently the president of Lin Pac has authorized the installation of an extruder of the capacity originally requested. The smaller extruder previously installed would be dismantled and eventually moved to a different plant. Due to this intermediate step, the anticipated construction schedule originally requested could not be met.

In addition, small dust collectors were originally approved for each of the new silos. The particulate collection system has been redesigned to route the exhaust from each silo to a common larger baghouse. This should result in an overall decrease in particulate emissions. The details of these changes will be provided when the operating permit is applied for.

Lin Pac Plastics, Inc. is requesting the existing construction permit be modified at this time to:

1. Extend the expiration date for one additional year. This will allow for the installation of the larger sized extruder and other equipment not already constructed.

EEC 90005.005

5119 NORTH FLORIDA AVENUE
P.O. BOX 7854
TAMPA, FLORIDA 33673
813/237-3781
800/229-3781
TELEFAX 813/238-0036

Mr. C.H. Fancy, P.E., Chief
December 6, 1993
Page Two

2. Increase the hours of operation from the 8400 hrs/yr as specified in Specific Condition No. 2 to 8760 hrs/yr. The emission cap of 230 tons per year would not be changed. Therefore the hourly and daily emission rates would be reduced according. (ie: 52.5 lbs VOC/hr and 1260.3 lbs VOC/day).
3. Pursuant to Mr. Howard Rhodes' Memorandum entitled "Air Toxics Program Development and Use of Air Toxics Permitting Strategy" dated November 29, 1993 (copy attached), Specific Condition 5 which requires modeling for butane emission from the facility should be deleted since this chemical is not a Title III listed pollutant.

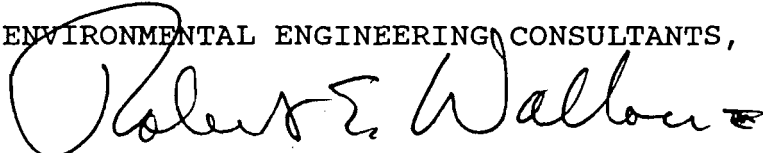
A modification processing fee of \$250.00 is attached.

Should you or your staff have any questions, please give Jim Estler at call at (813) 238-3311. If you feel a meeting to discuss the construction permit modification would assist you in processing this request, please do not hesitate to ask.

Your continued cooperation in this regard is appreciated.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.



Robert E. Wallace III, P.E.
President

REW/JWE/ddg

Attachments

cc: David Knowles, FDEP - Ft. Myers, FL
Charlie Odle, Lin Pac Plastics, Inc. - Sebring, FL
Tony Heap, Lin Pac Plastics, Inc. - Wilson, N.C.

Memorandum

Florida Department of
Environmental Protection

TO: Ed Middleswart NW District
Chris Kirts NE District
Chuck Collins Central Florida District
Bill Thomas SW District
David Knowles South Florida District
Isidore Goldman SE District

Al Linero Broward County
H. Patrick Wong Dade County
Steve Pace Duval County
Iwan Choronenko Hillsborough County
Jim Stormer Palm Beach County
Peter Hessling Pinellas County
J. Kent Kimes Sarasota County
Dennis Nester Orange County

Dotty Diltz Bureau of Air Monitoring and
Mobile Sources

Clair Fancy Bureau of Air Regulation

FROM: Howard L. Rhodes, Director *HLR*
Division of Air Resources Management

DATE: November 29, 1993

SUBJECT: Air Toxics Program Development and Use of Air
Toxics Permitting Strategy

By January 1994, the EPA expects to promulgate eight air toxics rules under Section 112 of the Clean Air Act. Maximum achievable control technology (MACT) standards for as many as 28 source categories are expected to be issued or proposed by the end of 1994. (The first of these standards, for commercial and industrial dry cleaners, was published September 22.) Furthermore, the state must adopt a hazardous air pollutant (HAP) new source review rule and a MACT "hammer" rule by the Fall of 1994 to be eligible to receive delegation of the Title V permitting program.

This memo is to update you on how the Division will be responding to these new requirements organizationally and to identify some of the key issues that will need to be addressed. It is also intended to provide new guidance on use of the "air toxics permitting strategy" modeling methodology.

Air Toxics Subsection

The Air Toxics Subsection in the Office of Policy Analysis and Program Management (SC 278-0114) will continue to be the focal point for all air toxics program development activities. John Glunn will be the lead contact for the overall program, including all grant-related and rulemaking activities. Tom Savage and Beth Hardin will be assigned responsibility for tracking specific EPA activities and disseminating information to other air program staff as needed. For example, Beth is currently analyzing the dry cleaner NESHAP and the proposed "general provisions" of 40 CFR 63; Tom is following the HON and the "early reductions" program.

The Air Toxics Subsection will function primarily as a planning and development group. As elements of the air toxics program (permitting, compliance, source sampling, emissions reporting, and ambient monitoring) become integrated into the operational units of the air program throughout the state, the Air Toxics Subsection will be available to provide technical support.

Florida Air Toxics Working Group (FLATWG)

The Florida air toxics working group was established prior to passage of the Clean Air Act Amendments of 1990 to develop recommendations for a state air toxics control program. Since then, the role of the group has changed. Now, the primary function of FLATWG is to facilitate implementation of the federal air toxics program in Florida. Each district and local air program, as well as the two DARM bureaus, should designate a FLATWG representative. The Air Toxics Subsection will work through the FLATWG representatives to keep air program staff in all offices informed of air toxics developments and to share ideas on how to respond to the various EPA requirements. The group will continue to hold periodic teleconferences and meet in a half-day session at the Annual Air Meeting.

Air Toxics Program Development Issues

The major issues to be addressed in the development of Florida's air toxics program are as follow:

1. Adoption by reference of federal standards: How should this be handled on an ongoing basis? What, if any, standards should not be adopted? How should implementation of the standards through the permitting process be coordinated? How should compliance with area-source standards be assured?

2. Rule development at state level: How should the Department respond to the need for HAP new source review and MACT hammer rules to obtain Title V delegation, especially in the absence of final EPA rules? What role, if any, should a procedure similar to the current air toxics permitting strategy play in this rulemaking?
3. Accidental release program: What role, if any, should the district and local programs assume in implementation of the Section 112(r) program in Florida? Should routine compliance inspections be used to verify that sources are adhering to their risk management plans?
4. Air toxics assessment: How and to what extent should air toxics assessment activities such as emissions inventories, emission speciation studies, high-risk point source evaluations, ambient monitoring programs, receptor modeling studies, ecosystem assessments, and risk assessments be carried out?

The Air Toxics Subsection, with input from FLATWG, will be considering these issues over the next several months and developing options for our consideration.

Air Toxics Permitting Strategy

Special mention must be made of the "air toxics permitting strategy" and its use in the emerging air toxics program. The strategy was developed several years ago as a tool to assist district and local program air permit engineers in evaluating permit applications that involved significant emissions of hazardous air pollutants. Indeed, the strategy has been effective in addressing air toxics in a flexible manner, and its use was upheld in a permit hearing. At one point, the Division intended to eventually adopt the strategy as part of a state air toxics rule. However, this plan was changed by passage of the Clean Air Act Amendments of 1990.

In the future, the control of HAP emissions in Florida will be dominated by the programs and standards developed under Title III of the Clean Air Act Amendments of 1990. Once the Title V operating permit program is approved by EPA, all Title III permitting requirements will become federally enforceable permit conditions within the Title V permits. On the other hand, any HAP emission limit or work practice standard based on a state program different than Title III (such as our toxics permitting strategy) will not be made a federally enforceable Title V permit condition unless EPA has approved the state program under Section 112(l) of

the Act or the applicant accepts the permit condition for other reasons. There are no plans to seek approval of our permitting strategy since it would involve formally adopting the strategy as an alternative to the federal program.

This is not to imply that the strategy will no longer serve a useful purpose. Section 112(g) requires states to develop rules that will require new or modified sources proposing to increase hazardous air pollutant emissions above "de minimis" amounts to undergo case-by-case MACT determinations. How EPA will define "de minimis" is not certain, but it may involve a process that is similar to our strategy. Once a de minimis threshold is exceeded, the case-by-case MACT process may require that ambient concentrations, and resultant health impacts, be considered along with other factors in determining the appropriate MACT standard. Therefore, the strategy continues to reflect incipient agency rulemaking, though the final direction of this rulemaking is uncertain at this time.

In any case, if the air toxics permitting strategy is to function in the context of Title III and Title V, it must be revised. First, it must be viewed as an air toxics "evaluation tool" rather than a "permitting strategy." Second, it must be limited in its application to the 189 hazardous air pollutants currently regulated under Title III and state law. Third, the modeling protocol needs to use the better air dispersion models now available. Fourth, the source of each of the health benchmarks chosen to define a reference ambient concentration must be clear and defensible. Finally, the term "no threat level" must be changed to more accurately reflect the purpose of these values. Anticipate that changes to the strategy in line with these points will be discussed at the Annual Air Meeting.

In the meantime, you may use the strategy as a tool during those preconstruction reviews where an apparent public health threat exists. However, do not consider pollutants other than the 189 currently regulated HAPs. Also, do not use the strategy in the context of operation permit renewals. The "no threat levels" are not environmental standards; therefore, a predicted concentration in excess of any such level is not an automatic grounds for permit denial. Other factors, such as the reasonableness of the proposed control technology should be considered.

If you wish to discuss these issues further, please call John Glunn at 904/488-0114.

HLR/jg/p

cc: Larry George
John Glunn
Tom Savage
Beth Hardin
Tom Rogers

Is your RETURN ADDRESS completed on the reverse side?

SENDER: <ul style="list-style-type: none">• Complete items 1 and/or 2 for additional services.• Complete items 3, and 4a & b.• Print your name and address on the reverse of this form so that we can return this card to you.• Attach this form to the front of the mailpiece, or on the back if space does not permit.• Write "Return Receipt Requested" on the mailpiece below the article number.• The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: <i>Tony Deap, Vice Pres. Lin Pac Plastics P.O. Box 1149 Sebring, FL 33871-1149</i>		4a. Article Number <i>P 360 185 702</i>	
5. Signature (Addressee) <i>[Signature]</i>		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) <i>[Signature]</i>		7. Date of Delivery <i>2-20-93</i>	
		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

P 360 185 702

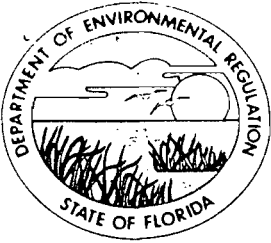


Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to <i>Tony Deap</i>	
Street and No. <i>Lin Pac Plastics</i>	
P.O. State and ZIP Code <i>Sebring, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>2-17-93 AC 28-187809</i>	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tony Heap, Vice President
Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

Dear Mr. Heap:

The Department received your request for a one-year extension of the construction permit referenced below. The permit is amended as shown.

Permit No. AC28-187809

Current Expiration Date: December 31, 1992

New Expiration Date: December 31, 1993

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; }

Mr. Tony Heap
Permit Extension
Page 2

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter shall become an attachment to this permit.

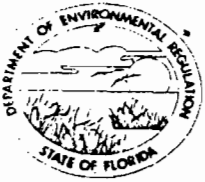
Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/JR/plm

cc: D. Knowles, SD
R. Wallace, P.E.
J. Estler, EEC



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard L. Rhodes
FROM: C. H. Fancy *CHF*
DATE: February 16, 1993
SUBJ: Amendment to Construction Permit AC28-187809
Lin Pac Plastics, Inc.

Attached for your approval and signature is a letter extending the expiration date for the above referenced construction permit. The permittee requested additional time due to construction delays.

The Bureau recommends approval of this amendment.

CHF/JR/plm

Attachment



ENVIRONMENTAL
ENGINEERING
CONSULTANTS, INC.

February 8, 1993

Mr. C.H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Highlands County - AP
Lin Pac Plastics, Inc.
AC28-187809

Dear Mr. Fancy:

On December 21, 1992, Environmental Engineering Consultants, Inc. submitted a letter requesting a one (1) year extension for the above referenced construction permit. Mr. John Reynolds of your office requested additional information justifying the requested time. The following information details the pieces of equipment that have not yet been installed at the facility:

1. Thermoformer with grinder and blower.
2. Large scrap grinder with blower.

We estimate that the construction and installation will be completed by July 1, 1993. Regrettably, the main cause for Lin Pac Plastics, Inc. delay has been a slowdown in their business, due to the recession.

Should you have any questions or need more information, please give me a call.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

Robert E. Wallace III, P.E.
President

REW/je/dege

EEC #90005.003

RECEIVED

FEB 10 1993

Division of Air
Resources Management

5119 NORTH FLORIDA AVENUE
P.O. BOX 7854
TAMPA, FLORIDA 33673

813/237-3781
800/229-3781
TELEFAX 813/238-0036



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1992 DEC 23 PM 12:41

ENVIRONMENTAL
ENGINEERING
CONSULTANTS, INC.

December 21, 1992

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Highlands County - AP
Lin Pac Plastics, Inc.
AC26-187809

Dear Mr. Fancy:

On behalf of our client, Lin Pac Plastics, Inc., Environmental Engineering Consultants, Inc. is requesting a one (1) year extension on the above reference construction permit. The plant is currently undergoing the construction to modify the polystyrene foam plant allowed under the construction permit. All the equipment has not yet been installed. When the construction is finalized, Lin Pac will submit the required Certification of Completion of Construction. A check for \$50.00 is attached to cover the handling fee.

Your prompt attention to this matter will be appreciated. Should you or your staff have any questions, please give Jim Estler of my staff a call at 1-800-229-3311.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

Robert E. Wallace, III, P.E.
President

cc: Florida Department of Environmental Regulations - Fort Myers
Charlie Odle, Lin Pac Plastics, Inc.

J. Reynolds

RECEIVED
AIR RES. MGT
DEC 28 1992

RECEIVED
AIR RES. MGT

DEC 23 1992

EEC #90005.002

5119 NORTH FLORIDA AVENUE
P.O. BOX 7854
TAMPA, FLORIDA 33673
813/237-3781
800/229-3781
TELEFAX 813/238-0036

LIN PAC PLASTICS, SEBRING FL 33871-1149
A DIVISION OF LIN PAC INC.

012732

OUR REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
	122192	12/21/92	50.00	50.00		50.00
	RENEWAL PERMIT -AIR QUALITY					

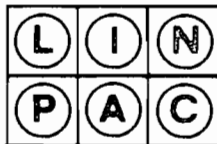
RECEIVED
FISCAL RES. MGMT.

DEC 23 1992

RECEIVED
FISCAL RES. MGMT.

DEC 28 1992

CHECK TOTAL \$50.00



LIN PAC PLASTICS
A DIVISION OF LIN PAC INC.
SEBRING INDUSTRIAL AIR PARK
P.O. BOX 1149
SEBRING, FLORIDA 33871-1149
813-655-1841

WACHOVIA BANK & TRUST CO., N.A.
POST OFFICE BOX 7260
WILSON, NORTH CAROLINA 27895
66-763/531

012732

DATE
12/21/92

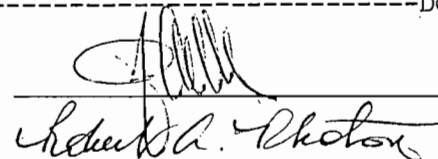
CONTROL NO.
12732

AMOUNT
\$50.00

PAY FIFTY and 00/100-----
TO THE ORDER OF

-----DOLLARS

FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATIONS


Robert A. Photon

[Redacted line]

BEST AVAILABLE COPY



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

5480399702

2290M

5480399702

RECIPIENT'S COPY

Date 12-22-92			
From (Your Name) Please Print Ann Russo		To (Recipient's Name) Please Print C.H. Fancy, P.E., Chief	
Company ENVIRONMENTAL ENGINEERING CONS		Company Fla. Dept. of Environ. Regulation	
Street Address 2139 N FLORIDA AVE		Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 2600 Blair Stone Rd.	
City TAMPA	State FL	City Tallahassee	State FL
ZIP Required 33603		ZIP Required 32399-2400	
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) 90005		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required	
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card 5 <input type="checkbox"/> Cash/Check			
4 SERVICES (Check only one box) Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Freight Service (for packages over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT 80 <input type="checkbox"/> TWO-DAY FREIGHT		5 DELIVERY AND SPECIAL HANDLING (Check services required) HOLD FOR PICK-UP (Fill in Box H) 1 <input type="checkbox"/> WEEKDAY or 31 <input type="checkbox"/> SATURDAY DELIVER { 2 <input checked="" type="checkbox"/> WEEKDAY or 3 <input type="checkbox"/> SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE Dangerous Goods Shipper's Declaration not required Dry Ice, 9, UN 1845, X kg, III 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	
		6 PACKAGES WEIGHT In Pounds Only YOUR DECLARED VALUE (See right) Emp. No. Date <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number DIM SHIPMENT (Chargeable Weight) L x W x H Received At 1 <input type="checkbox"/> Regular Stop 2 <input type="checkbox"/> Drop Box 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station 2 <input checked="" type="checkbox"/> On-Call Stop 7 Release Signature:	
		Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 6/92 PART #137204 FXEM 0/92 FORMAT #136 136 © 1991-92 FEDEX PRINTED IN U.S.A.	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Tony Heap Vice President Lin Pac Plastics, Inc. P. O. Box 1149 Sebring, FL 33871-1149	4. Article Number P 407 853 134 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Addressee * <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent * <i>[Signature]</i>	
7. Date of Delivery 2-12-91	

Always obtain signature of addressee or agent and DATE DELIVERED.

PS Form 3811, Apr. 1989

★ U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 407 853 134
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

★ U.S.G.P.O. 1989-234-555

Sent to Mr. Tony Heap, Lin Pac Plastics	
Street and No. P. O. Box 1149	
P.O., State and ZIP Code Sebring, FL 33871-1149	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 1-28-91 Permit: AC 28-187809	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Tony Heap, Vice President
Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

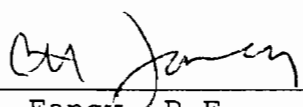
January 28, 1991

Enclosed is construction permit No. AC 28-187809 to modify the polystyrene foam plant at Lin Pac Plastics, Inc. in Sebring, Highlands County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copy furnished to:

D. Knowles, South Dist.
R. Wallace, P.E.
J. Estler, EEC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 1-28-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kim Toben
Clerk

1-28-91
Date

Final Determination

Lin Pac Plastics, Inc.
Highlands County
Sebring, Florida

Modify Polystyrene Foam Plant
Permit No. AC 28-187809

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 18, 1990

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to modify the polystyrene foam plant at Lin Pac Plastics, Inc. in Sebring, Highlands County, Florida, was distributed on December 17, 1990. The Notice of Intent to Issue was published in The Sebring News-Sun, Inc. on December 26, 1990. Copies of the evaluation were available for public inspection at the Department's Tallahassee and South District offices.

Comments from the applicant regarding butane's listing as a category A or B contaminant were submitted on the Department's Intent to Issue the permit. It was found that butane is not properly identified as a "category B" pollutant on the Department's draft document for toxic pollutants. Specific Condition No. 5 has been changed as requested. The final action of the Department will be to issue construction permit AC 28-187809 with the changes requested by the applicant.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

Permit Number: AC 28-187809

Expiration Date: December 31, 1992

County: Highlands

Latitude/Longitude: 27°27'23"N
81°21'20"W

Project: Modify Polystyrene Foam
Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modification of a polystyrene foam manufacturing facility located in Sebring, Florida. The UTM coordinates are Zone 17, 464.9 km East and 3036.9 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received on October 3, 1990.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application. Maximum capacity of the new continuous extruder shall be 750 lbs/hr.

2. The polystyrene foam manufacturing facility shall be allowed to operate 8,400 hours per year.

3. Butane emissions shall not exceed 54.8 lbs/hr, 1,315 lbs/day and 230 tons/year. Compliance shall be demonstrated over a 30-day period by applying the following raw material utilization rates: Butane - 93.0 lbs/hr, Resin - 2,216.7 lbs/hr.

4. Visible emissions from each of the silos shall not exceed 5% opacity and compliance shall be demonstrated using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

5. Until the Department determines other concentrations are required to protect public health and safety, the predicted ambient air concentration of butane shall not exceed that calculated by the following formula:

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

$$\text{AAC (8 hr)} = \frac{(\text{OEL})}{\text{safety factor}} = 38,000$$

$$\text{AAC (24 hr)} = \frac{(\text{OEL})}{\text{safety factor}} = 9,050$$

where,

AAC = acceptable ambient concentration (micrograms/m³)

OEL = Occupational exposure level (ACGIH, OSHA, and NIOSH published standards for toxic materials).

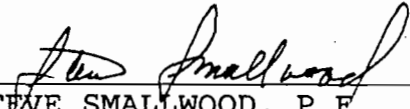
6. Compliance with the acceptable ambient concentrations shall be demonstrated based on calculations done by a registered professional engineer using actual operating conditions. Determination of the ambient concentration shall be made with Department approved dispersion models or ambient monitoring.

7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

8. An application for an operation permit must be submitted to the South District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 25th day
of January, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


STEVE SMALLWOOD, P.E., Director
Division of Air Resources, Mgmt.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CF*
DATE: January 18, 1991
SUBJ: Approval of Construction Permit AC 28-187809
Lin Pac Plastics, Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to modify their polystyrene foam plant in Sebring, Highlands County, Florida.

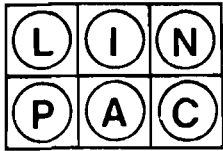
Comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is February 2, 1990.

I recommend your approval and signature.

CF/JR/plm

Attachments



Tel: (813) 655 - 1841

LIN PAC PLASTICS

Division of Lin Pac, Inc.

SEBRING AIR TERMINAL, P. O. BOX 1149, SEBRING, FLORIDA 33871-1149

January 3, 1991

RECEIVED
JAN 7 1991
DER-BAQM

Florida Department of Environmental Regulation
ATTN: C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Twin Towers Office Building
2600 Blair & Stone Road
Tallahassee, Fl. 32399-2400

Dear Mr. Fancy:

Reference DER file No. AC 28-187809, application for permit by
Lin Pac Plastics, Inc. of Sebring, Florida.

Please find enclosed the proof of publication as required by your
December 17, 1990 letter.

Sincerely,

Charles J. Olde
Plant Manager

Enclosures:

cc: T. Heap - VP Lin Pac Plastics
J. Estler - Environmental Engineering Consultants.

g. Reynolds
B. Thomas, SW Dist

BEST AVAILABLE COPY

FEDERAL EXPRESS QUESTIONS? CALL 800-238-5355 TOLL FREE		AIRBILL PACKAGE TRACKING NUMBER	
173M 8059046914		8059046914	
Date: 1-4-91		RECIPIENT'S COPY	
From (Your Name) Please Print: IN PAC PLASTICS INC		To (Recipient's Name) Please Print: C. H. FADAY, P.E.	
Your Phone Number (Very Important): 813-655-1341		Recipient's Phone Number (Very Important):	
Company: IN PAC PLASTICS INC		Company:	
Department/Floor No.:		Department/Floor No.:	
Street Address: LEBRING IND AIRPORT BLDG 917		Exact Street Address (We cannot deliver to P.O. Boxes or P.O. Zip Codes):	
City: LEBRING State: FL ZIP Required: 33870		City: State: ZIP Required:	
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice): 93 711			
PAYMENT: <input checked="" type="checkbox"/> Bill Sender, <input type="checkbox"/> Bill Recipient's FedEx Acct. No., <input type="checkbox"/> Bill 3rd Party FedEx Acct. No., <input type="checkbox"/> Bill Credit Card		IF HOLD FOR PICK-UP: Print FEDEX Address Here	
<input type="checkbox"/> Cash		Street Address:	
City: State: ZIP Required:		City: State: ZIP Required:	
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING	
Priority Overnight Service (Delivery by next business morning) Standard Overnight Service (Delivery by next business afternoon) 11 <input checked="" type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/> 16 <input type="checkbox"/> FEDEX LETTER 56 <input type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK 52 <input type="checkbox"/> FEDEX PAK 13 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> FEDEX TUBE Economy Service (formerly Standard Air) (Delivery by second business day) Heavyweight Service (for Extra Large or any package over 150 lbs.) 30 <input type="checkbox"/> ECONOMY SERVICE 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT *Delivery commitment may be later in some areas. *Declared Value Limit \$100. **Call for delivery schedule.		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE Lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	
PACKAGES WEIGHT in Pounds Only YOUR DECLARED VALUE OVER SIZE		Emp. No.: Date: Federal Express Use	
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DIM SHIPMENT (Heavyweight Services Only) <input type="checkbox"/> Received At: Lbs.		City: State: Zip:	
1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input checked="" type="checkbox"/> Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Received By: X Date/Time Received: FedEx Employee Number:	
FedEx Emp. No.:		Release Signature: Date/Time:	
014		REVISION DATE 11/89 PART 119501 EXEM 6/90 FORMAT 1014 © 1989 F.E.C. PRINTED IN USA	

The Sebring News - Sun, Inc.

Published Twice Weekly

SEBRING, HIGHLANDS COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF HIGHLANDS:

Before the undersigned authority personally appeared

Richard Birt

who on oath says that he is Controller of NEWS-SUN a bi-weekly newspaper published at Sebring in Highlands County, Florida; that the attached copy of advertisement, being a Proof of Publication

in the matter of Notice of Intent

in the Court was published in said newspaper in the issues of 12/26/90

Affiant further says that the NEWS-SUN is a newspaper published at Sebring, in Highlands County, Florida, and that the said newspaper has heretofore been continuously published in said Highlands County, Florida, Wednesday and/or Sunday and has been entered as a second class mail matter at the post office in Sebring and/or Avon Park, in said county, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

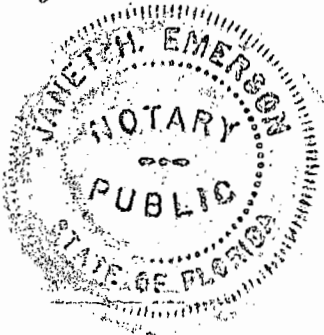
Sworn to and subscribed before me this 26 day of December

A. D. 1990

Janet H. Emerson

Richard Birt

Notary Public, State Of Florida At Large
My Commission Expires Oct. 9, 1992
Bonded By Lawyers Surety Corp



State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Lin Pac Plastics, Inc., Sebring Air Terminal, Sebring, Florida 33871-1149, for modification of the polystyrene foam manufacturing facility in Sebring, Highlands County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
South District
2269 Bay Street
Fort Myers, Florida 33901-2896

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination. Dec. 26, 1990



RECEIVED

JAN 8 1991

ENVIRONMENTAL
ENGINEERING
CONSULTANTS, INC.

January 4, 1991

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulations
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER-BAQM

Re: Highlands County - AP
Lin Pac Plastics, Inc. - AC28-187809

Dear Mr. Fancy:

The Letter of Intent to Issue for the proposed permit has been received and evaluated. Specific Condition No. 5 established 8-hour and 24-hour acceptable ambient concentrations for butane of 380 and 21.5 micrograms/m³ respectively.

According to the published draft guidelines to control toxic contaminants developed by FDER in 1985 and our understanding of the current guidelines being developed internally and not yet released to the public, the procedure for developing the 8-hour and the 24-hour acceptable ambient concentration is as follows:

For chemicals currently in FDER's unpublished list with an occupational exposure level (OEL) greater than or equal to 1,000 mg/m³, the appropriate safety factor would be 50 (formally called Category B Contaminants). For those compounds with an OEL of less than 1,000 mg/m³, the safety factor would be 100 (formally called Category A Contaminants). The 8-hour TWA-TLV for butane 5 is 1,900 mg/m³.

The 8-hour acceptable ambient concentration (ACC) in micrograms/m³ would then be:

$$\begin{aligned} \text{AAC (8-hour)} &= \frac{40 \text{ hrs/wk}}{40 \text{ hrs/wk}} \times \frac{1}{50} \times 1,900,000 \text{ ug/m}^3 \\ &= 38,000 \text{ ug/m}^3 \end{aligned}$$

The 24-hour AAC would be:

$$\begin{aligned} \text{AAC (24-hour)} &= \frac{40 \text{ hrs/wk}}{168 \text{ hrs/wk}} \times \frac{1}{50} \times 1,900,000 \text{ ug/m}^3 \\ &= 9,047.6 \text{ ug/m}^3 \end{aligned}$$

5119 NORTH FLORIDA AVENUE
PO. BOX 7854
TAMPA, FLORIDA 33673

813/237-3781
813/238-0036

BEST AVAILABLE COPY

FEDERAL EXPRESS QUESTIONS? CALL 800-238-5355 TOLL FREE		AIRBILL PACKAGE TRACKING NUMBER 7544531046	
137M 7544531046		RECIPIENT'S COPY	
From (Your Name) Please Print James Estler		To (Recipient's Name) Please Print C. H. Fancy	
Your Phone Number (Very Important) 813 237-3781		Recipient's Phone Number (Very Important) (904) 488-13	
Company ENVIRONMENTAL ENGINEERING CONS		Company FL Dept. of Environmental Regulation	
Street Address 9119 N. FLORIDA AVE		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes) 2600 Blair Stone Road	
City TAMPA		City Tallahassee, FL	
State FL		State FL	
ZIP Required 33602		ZIP Required 32399-2400	
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.) 90005		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required	
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card <input type="checkbox"/> Cash		City State ZIP Required	
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING	
Priority Overnight Service (Delivery by next business morning) <input type="checkbox"/> YOUR PACKAGING <input checked="" type="checkbox"/> FEDEX LETTER <input type="checkbox"/> FEDEX PAK <input type="checkbox"/> FEDEX BOX <input type="checkbox"/> FEDEX TUBE Economy Service (formerly Standard Air) (Delivery by second business day) <input type="checkbox"/> ECONOMY SERVICE Standard Overnight Service (Delivery by next business afternoon) <input type="checkbox"/> FEDEX LETTER <input type="checkbox"/> FEDEX PAK <input type="checkbox"/> FEDEX BOX <input type="checkbox"/> FEDEX TUBE Heavyweight Service (for Extra Large or any package over 150 lbs.) <input type="checkbox"/> HEAVYWEIGHT <input type="checkbox"/> DEFERRED HEAVYWEIGHT *Declared Value Limit \$100 *Call for delivery schedule		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box 1) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	
PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE		Emp. No. Date <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By Date/Time Received FedEx Employee Number Release Signature Date/Time	
DIM SHIPMENT (Heavyweight Services Only) <input type="checkbox"/> Regular Stop <input type="checkbox"/> Drop Box <input type="checkbox"/> B.S.C. <input type="checkbox"/> On-Call Stop <input type="checkbox"/> Station		Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 11/89 PART #119501 FXEM 5/90 FORMAT #014 014 © 1989 F.E.C. PRINTED IN U.S.A.	

Mr. C. H. Fancy
January 4, 1991
Page Two
- - - - -

These values differ significantly with the ones established in the proposed permit.

It is our understanding that two lists of air toxic chemicals are being developed internally. One lists the chemical with the CAS numbers and other data including the OEL. The other lists the same chemicals with the CAS number and calculated no-threat levels (NTL). The NTL are calculated by taking the OEL and dividing it by the appropriate safety factor. It would appear the NTL values were used instead of the OEL and then they were divided by the safety factor for a Category A Contaminant.

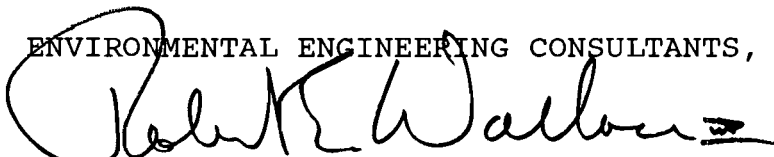
We have discussed this matter with Matt McCann of FDER - Tampa office and he is in agreement of assessment and recommend charges

On behalf of our client, Lin Pac Plastics Inc., EEC hereby requests Specific Condition No. 5 of the proposed permit be changed to reflect the correct acceptable ambient concentration calculated above.

Should you have any questions, please contact Jim Estler at 1-800-229-3311.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.



Robert E. Wallace III, P.E.
President

REW/JE/lrp

cc: Charlie Odle

J. Reynolds
B. Thomas, SW Dist.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
 Mr. Tony Neap, UP
 Lin Pac Plastics, Inc.
 P.O. Box 1149
 Sebring, FL 33871-1149

4. Article Number
 P 256 395 051

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
David Kroger

6. Signature - Agent
 X

7. Date of Delivery
 12-27-90

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 256 395 051

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to
 Tony Neap

Street and No.
 Lin Pac Plastics

P.O. State and ZIP Code
 P.O. Box 1149

Postage
 Sebring, FL

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt showing to whom and Date Delivered

Return Receipt showing to whom, Date, and Address of Delivery

TOTAL Postage and Fees \$

Postmark or Date
 12-19-90
 AC 28-187809



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 17, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Tony Heap, Vice President
Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

Dear Mr. Heap:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for modification of the polystyrene foam manufacturing facility in Sebring, Highlands County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/JR/plm

Attachments

c: D. Knowles, South Dist.
R. Wallace, P.E.
J. Estler, EEC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

DER File No. AC 28-187809

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Lin Pac Plastics, Inc., applied on October 23, 1990, to the Department of Environmental Regulation for a permit to modify a polystyrene foam manufacturing facility in Sebring, Highlands County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

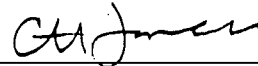
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements

specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Copies furnished to:

D. Knowles, South Dist.

R. Wallace, P.E.

J. Estler, EEC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 12-19-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Keri Deben
Clerk

12-19-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Lin Pac Plastics, Inc., Sebring Air Terminal, Sebring, Florida 33871-1149, for modification of the polystyrene foam manufacturing facility in Sebring, Highlands County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
South District
2269 Bay Street
Fort Myers, Florida 33901-2896

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Lin Pac Plastics, Inc.
Highlands County
Sebring, Florida

Modify Polystyrene Foam Plant
Permit No. AC 28-187809

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

December 17, 1990

I. Application Information

A. Applicant

Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

B. Request

The Department received a complete application on October 3, 1990, for a permit to change the blowing agent from Freon 22 to Butane while adding an extruder and storage silos at their foam packaging facility in Sebring, Florida.

C. Location/Classification

The applicant's facility (SIC Code 3086) is located at the Sebring Air Terminal. Latitude and longitude are 27°27'23"N and 81°21'20"W, respectively. The UTM coordinates of the site are: Zone 17, 464.9 km E and 3036.9 km N.

II. Project Description/Emissions

Polystyrene foam food packaging materials are produced at the applicant's site by the foam extrusion process. Resin pellets are shipped by railcar and unloaded pneumatically into two virgin resin storage silos from which the pellets are transferred to three continuous extruders. The addition of a fourth extruder with a capacity of 750 lbs/hr is proposed by the applicant, along with a change in the blowing agent from Freon 22 to butane for all four extruders. Also proposed is the addition of a baghouse on the fluff silos which receive ground material for transfer to the reclaim pelletizer.

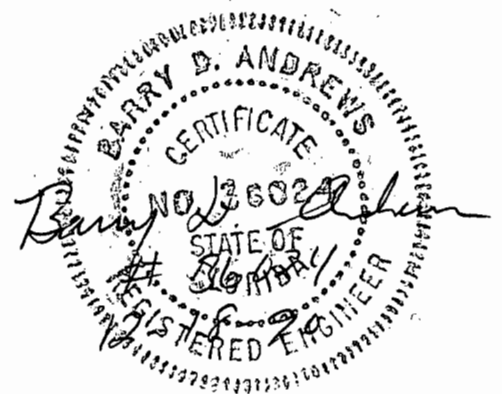
Particulate matter emissions are generated by three sources within the facility: the virgin resin silos, the fluff silos, and the reclaim silos. Total actual particulate matter emissions are estimated to be 4.7 lbs/hr and 20.0 tons/yr. Butane emissions are estimated at 54.8 lbs/hr and 230 tons/yr. The butane emissions reflect a reduction of 17 tons/yr from the existing level of hydrocarbon emissions.

II. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The applicant's facility is located in an area classified as attainment for regulated pollutants. Since the emissions are below significant levels, this installation is not subject to the requirements of F.A.C. Rule 17-2.500 (new source review). Applicable rules are F.A.C. Rule 17-2.520, Sources not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C. Rule 17-2.610 and F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards.

IV. Conclusion

Based on the information provided by Lin Pac Plastics, Inc., the Department has reasonable assurance that the proposed installation, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Lin Pac Plastics, Inc.
P. O. Box 1149
Sebring, Florida 33871-1149

Permit Number: AC 28-187809

Expiration Date: December 31, 1992

County: Highlands

Latitude/Longitude: 27°27'23"N
81°21'20"W

Project: Modify Polystyrene Foam
Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modification of a polystyrene foam manufacturing facility located in Sebring, Florida. The UTM coordinates are Zone 17, 464.9 km East and 3036.9 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received on October 3, 1990.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

GENERAL CONDITIONS:

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application. Maximum capacity of the new continuous extruder shall be 750 lbs/hr.

2. The polystyrene foam manufacturing facility shall be allowed to operate 8,400 hours per year.

3. Butane emissions shall not exceed 54.8 lbs/hr, 1,315 lbs/day and 230 tons/year. Compliance shall be demonstrated over a 30-day period by applying the following raw material utilization rates: Butane - 93.0 lbs/hr, Resin - 2,216.7 lbs/hr.

4. Visible emissions from each of the silos shall not exceed 5% opacity and compliance shall be demonstrated using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

5. Until the Department determines other concentrations are required to protect public health and safety, the predicted ambient air concentration of butane shall not exceed that calculated by the following formula:

PERMITTEE:
Lin Pac Plastics, Inc.

Permit Number: AC 28-187809
Expiration Date: December 31, 1992

SPECIFIC CONDITIONS:

$$\text{AAC (8 hr)} = \frac{(\text{OEL})}{\text{safety factor}} = \frac{38,000}{100} = 380$$

$$\text{AAC (24 hr)} = \frac{(\text{OEL})}{\text{safety factor}} = \frac{9,050}{420} = 21.5$$

where,

AAC = acceptable ambient concentration (micrograms/m³)

OEL = Occupational exposure level (ACGIH, OSHA, and NIOSH published standards for toxic materials).

6. Compliance with the acceptable ambient concentrations shall be demonstrated based on calculations done by a registered professional engineer using actual operating conditions. Determination of the ambient concentration shall be made with Department approved dispersion models or ambient monitoring.

7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

8. An application for an operation permit must be submitted to the South District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management

October 2, 1990

RECEIVED
DER - MAIL ROOM

1990 OCT 11 AM 8:31

ENVIRONMENTAL
ENGINEERING
CONSULTANTS, INC.

RECEIVED

OCT 11 1990

Mr. W. C. Thomas, P.E.
District Air Program Administrator
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Dear Mr. Thomas:

DER-BAQM

Attached is a construction/modification application Lin Pac Plastics, Inc. This applications calls for the addition of one more extrusion line, the rearrangement of some existing equipment within the plant, some changes to the small particulate sources and changing the blowing agent from Freon 22 to butane. This change to a more environmental sound blowing agent will decrease the overall hydrocarbon emission by approximately 17 TPY. There is an anticipated increase in particulate emission of approximately 6.7 TPY. Since the increase in particulate emission is less than 25 TPY, the application fee is \$200.00 pursuant to Section 17-4.050(4)(a)1.e., Florida Administrative Code.

As you are aware, there is an operating permit application on the existing facility currently being processed by your staff. The application is now complete and we are hopeful for permit issuance in the near future.

We would like to meet with appropriate members of the air permitting section to explain the process changes in detail and also to review the calculation procedures.

Your cooperation in this regard is appreciated. Should you or your staff have any questions, please contact either Charlie Odle, Plant Manager at (813) 655-1841 or me at (813) 238-3311.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

James Wm. Estler
Senior Environmental Engineer

D.E.R.

JWE/lrp/dege

OCT 02 1990

Enclosure:

D.E.R. SOUTHWEST DISTRICT TAMPA

cc: Tony Heap w/attachments
Charlie Odle w/attachments

B. Thomas, Southwest
J. Reynolds

SOUTHWEST DISTRICT TAMPA

5119 NORTH FLORIDA AVENUE
PO. BOX 7854
TAMPA, FLORIDA 33673

813/237-3781

813/238-0036

331/

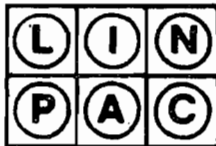
BEST AVAILABLE COPY

LIN PAC PLASTICS, SEBRING FL 33871-1149
A DIVISION OF LIN PAC INC.

006771

OUR REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
	92890	9/28/90	200.00	200.00		200.00
	PERMIT					

CHECK TOTAL \$200.00



LIN PAC PLASTICS
A DIVISION OF LIN PAC INC.
SEBRING INDUSTRIAL AIR PARK
P.O. BOX 1149
SEBRING, FLORIDA 33871-1149
813-655-1841

WACHOVIA BANK & TRUST CO., N.A.
POST OFFICE BOX 7260
WILSON, NORTH CAROLINA 27895
66-763/531

006771

DATE	CONTROL NO.	AMOUNT
9/28/90	6771	\$200.00

PAY TWO HUNDRED and 00/100-----DOLLARS
TO THE
ORDER OF

FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION
4520 OAK FAIR BOULEVARD
TAMPA, FLA. 33610-7347

[Signature]
[Signature]

VOLUME I

**CONSTRUCTION/MODIFICATION PERMIT APPLICATION
FOR LIN PAC PLASTICS, INC.
SEBRING, FLORIDA**

Prepared By:

**ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.
5119 NORTH FLORIDA AVENUE
TAMPA, FLORIDA 33603**

SUBMITTED: OCTOBER 2, 1990

LIN PAC PLASTICS

TABLE OF CONTENTS

Volume I

- I. Table of Contents
- II. Application
- III. Location Maps
- IV. Attachment
- V. Emission Calculations
- VI. Tables
- VII. Figures
- VIII. Dust Collector Information
- IX. Material Safety Data Sheet - Butane

Volume II

- X. Control Technology Overview Report Emissions From Rigid Foam Manufacturing



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

AC 28-187809

DER Form # _____
Form Title _____
Effective Date _____
DER Application No. _____
(Filed in by DER)

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Polystyrene Foam Manufacturing [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [X] Modification

COMPANY NAME: Lin Pac Plastics, Inc.

COUNTY: Highlands

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Polystyrene Foam Manufacturing

SOURCE LOCATION: Street Sebring Air Terminal

City Sebring

UTM: East 17-464.9

North 3036.9

Latitude 27° 27' 23"N

Longitude 81° 21' 20"W

APPLICANT NAME AND TITLE: Tony Heap, Vice President

APPLICANT ADDRESS: P.O. Box 1149; Sebring, FL 33871-1149

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Lin Pac Plastic

I certify that the statements made in this application for a operation permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

Tony Heap, Vice President

Name and Title (Please Type)

Date: 9/24/90 Telephone No. (919) 291-5800

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

DER Form 17-1.202(1)

Effective October 31, 1982

Page 1 of 12

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed

Robert E. Wallace III, P.E.

Name (Please Type)

Environmental Engineering Consultants, Inc.

Company Name (Please Type)

5119 North Florida Avenue; Tampa, Florida 33603

Mailing Address (Please Type)

Florida Registration No. 21608 Date: 10/2/90 Telephone No. (813) 237-3781

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Facility produces a variety of polystyrene foam packaging material for food distribution and service industry. These include egg cartons, food containers, meat and poultry trays, etc. The facility plans to change the blowing agent from Freon 22 to Butane.

In addition one new extruder, various silos will be added to the facility. This facility will be in full compliance with State standards.

- B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction As Soon As Approved Completion of Construction 3 yrs. from date of issuance

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Plant built in October, 1969 by Florida Containers, Inc. Ernest Kohler, Owner, purchased in February, 1981 by Charles Entenmann the name remained the same, purchased in March, 1985 by Lin Pac, Inc. Application in FDER - Tampa for existing facility.

Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 50;
if power plant, hrs/yr _____; if seasonal, describe: _____
Total 8,400 hrs/yr. 350 days/yr.

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No
 - a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram (lbs/yr)
	Type	% Wt		
Butane		4.0	93.0	781,200
Colorant		.34	7.9	66,402
Talc		.32	7.4	62,496
Resin		95.34	2216.7	18,619,902
Total =			2325.0	19,530,000

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 2325 lbs/hr; 19,530,000 lbs/yr (std. good output)

2. Product Weight (lbs/hr): 1395 lbs/hr; 11,718,000 lbs/yr (finished product)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr.	T/yr	
Butane	54.8	230	17-2.620(1)	54.8	54.8	230*	
Particulate	4.7	20.0	17-2.610(1)	34.4	4.7	20.0	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

* ~~Emission, if source operated without control (See Section V, Item 3).~~
Potential Emissions based on 8400 hr/yr. operation.

Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Particulate to be vented to a Torit Dust Collector - Model TD 573	Particulate	99.0%	N/A	Manufacturer's Guarantee and Engineering Judgement

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____
 Density: _____ lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: _____ BTU/lb _____ BTU/gal
 Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Solid waste generated are disposed of in accordance with FDER regulations.

Emission Stack Geometry and Flow Characteristics (Provide data for each stack): N/A*

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

*There are no stacks associated with the VOC sources, building exhausted through wall fans. See attachment for Particulate information.

SECTION IV: INCINERATOR INFORMATION

N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: ☐ Cyclone ☐ Wet Scrubber ☐ Afterburner

☐ Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)] Attached.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. See attached calculations. Emissions estimated based on EPA draft report "Control Technology Overview Report - Emissions From Ridgid Foam Manufacturing" copy attached.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test). Same as above.
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.) See control device specifications.
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency). Based on manufacturer's information and engineering judgement.
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. Attached.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map). Attached.
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram. Attached.

The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. Attached.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit. N/A

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

☐ Yes ☐ No

Contaminant

Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

☐ Yes ☐ No

Contaminant

Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

plain method of determining

5. Useful Life:

7. Energy:

9. Emissions:

6. Operating Costs:

8. Maintenance Cost:

Contaminant

Rate or Concentration

10. Stack Parameters

a. Height: ft. b. Diameter: ft.
c. Flow Rate: ACFM d. Temperature: °F.
e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device: b. Operating Principles:
c. Efficiency:¹ d. Capital Cost:
e. Useful Life: f. Operating Cost:
g. Energy:² h. Maintenance Cost:
i. Availability of construction materials and process chemicals:
j. Applicability to manufacturing processes:
k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device: b. Operating Principles:
c. Efficiency:¹ d. Capital Cost:
e. Useful Life: f. Operating Cost:
g. Energy:² h. Maintenance Cost:
i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? ☐ Yes ☐ No
- b. Was instrumentation calibrated in accordance with Department procedures?
☐ Yes ☐ No ☐ Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
2. Surface data obtained from (location) _____
3. Upper air (mixing height) data obtained from (location) _____
4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.
2. _____ Modified? If yes, attach description.
3. _____ Modified? If yes, attach description.
4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

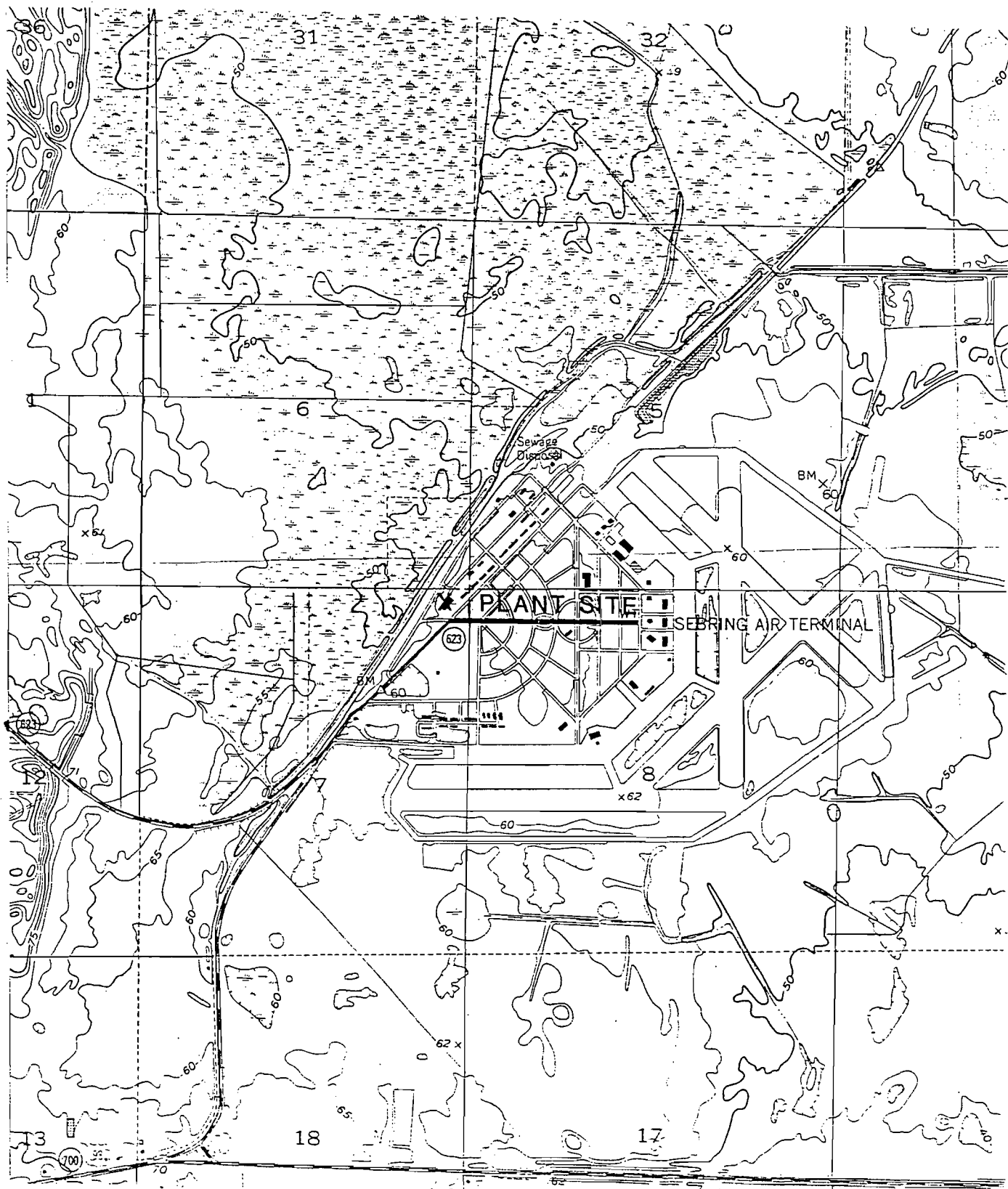
E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.



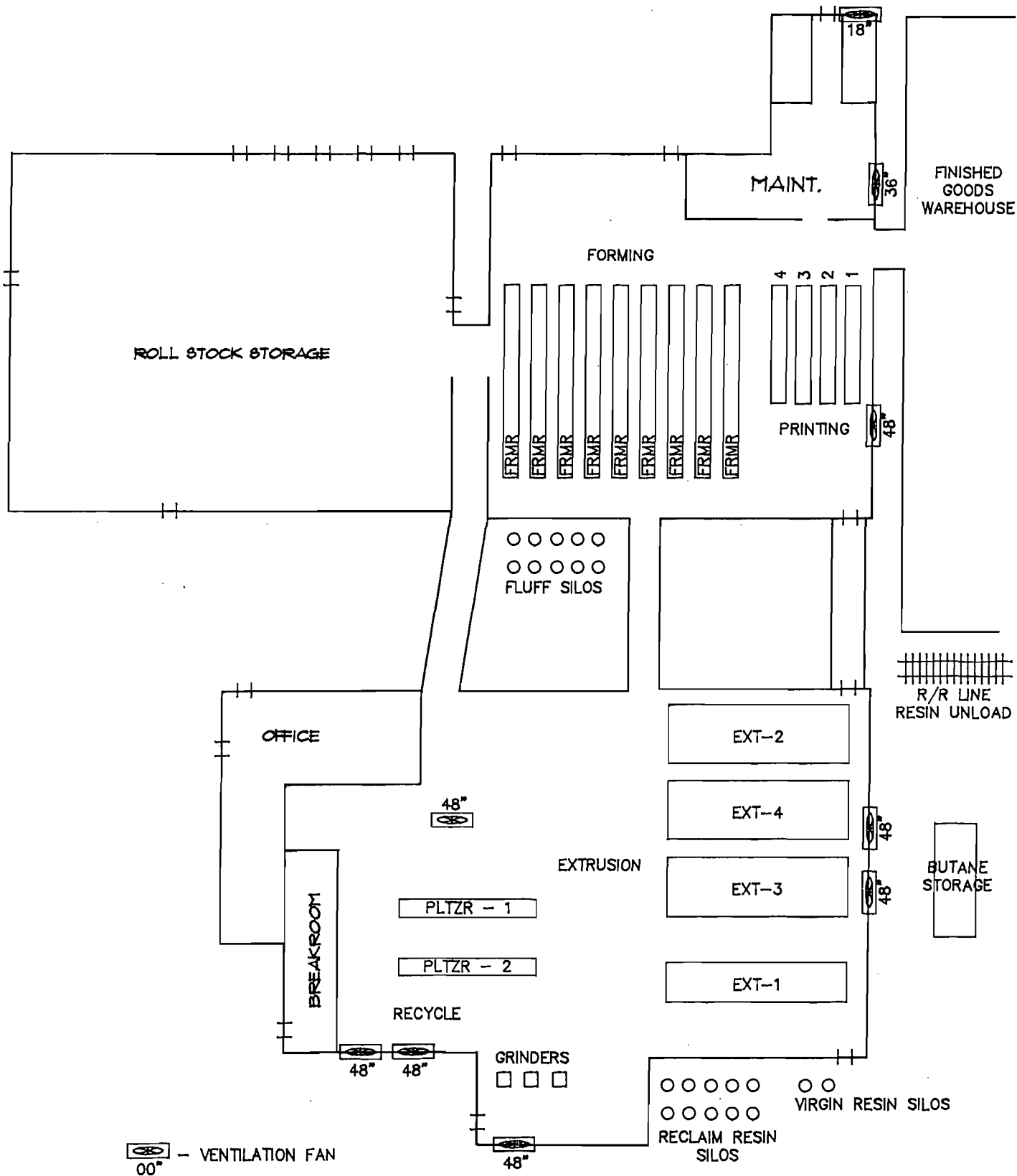
LORIDA. FLA.
N2722.5-W8115/7.5

1952
PHOTOREVISED 1972
AMS 4738 IV NE-SERIES V847

LIN PAC PLASTICS LOCATION MAP

ENVIRONMENTAL ENGINEERING
CONSULTANTS, INC.

CONSULTING ENGINEERS &
ENVIRONMENTAL SCIENTISTS



FILE NAME: 90006FADW3
 LAST UPDATED: 08/14/90
 LAST PLOTTED: 08/14/90



ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.
 CONSULTING ENGINEERS AND ENVIRONMENTAL SCIENTISTS
 5119 NORTH FLORIDA AVENUE - P.O. BOX 7864 - TAMPA, FLORIDA 33673

DESIGNED: J.E.

DRAWN: R.L.B.

CHECKED: J.E.

FIGURE 4 / PROPOSED SITE LAYOUT

LIN PAC PLASTICS

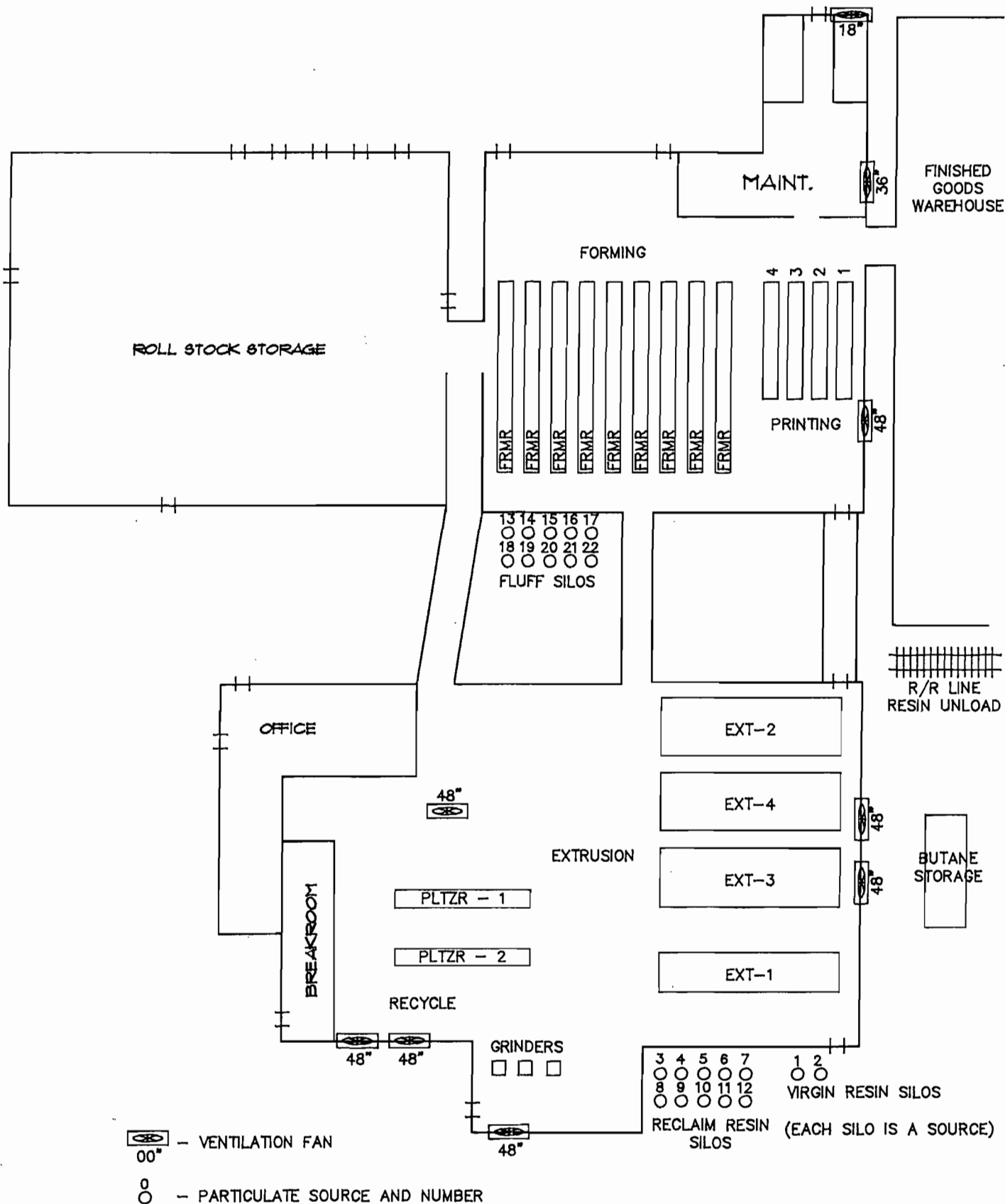
SEBRING, FLORIDA

DATE:
JUL 1990

SCALE:
N.T.S.

JOB NUMBER:
90006

SHEET:
P4



FILE NAME: 9000575.DWG
 LAST UPDATED: 08/14/90
 LAST PLOTTED: 08/14/90



ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.
 CONSULTING ENGINEERS AND ENVIRONMENTAL SCIENTISTS
 5119 NORTH FLORIDA AVENUE - P.O. BOX 7864 - TAMPA, FLORIDA 33673

DESIGNED: J.E.

DRAWN: R.L.B.

CHECKED: J.E.

FIGURE 5 / PROPOSED SITE LAYOUT

LIN PAC PLASTICS
 PARTICULATE SOURCE
 SEBRING, FLORIDA

DATE:
 JUL 1990

SCALE:
 N.T.S.

JOB NUMBER:
 90005

SHEET:
 F5

LIN PAC PLASTICS

ATTACHMENT A

PROCESS DESCRIPTION:

This plant is designed to produce a range of polystyrene foam packaging materials for the food service industry, these include egg cartons, fast-food containers, etc. The annual output is about 11,718,000 lbs/yr of finished product. As illustrated in Figure 1, the various processing stages are as follows:

PNEUMATIC CONVEYING OF VIRGIN POLYSTYRENE PELLETS FROM THE RAILCAR TO THE STORAGE SILO:

The resin pellet unloading system draws a vacuum on the line connected from the railcar to two (2) new 100 ton virgin storage silos. During the pneumatic loading of the silo, particulate (polystyrene fines) are not controlled. The total particulate emissions for this source is estimated to be 3.3 lb/hr; 14.0 ton/yr.

PNEUMATIC CONVEYING OF VIRGIN AND RECLAIMED POLYSTYRENE PELLETS FROM STORAGE SILOS TO THE VOLUMETRIC DRY FEEDERS TO THE FOAM EXTRUDERS:

A blower creates a vacuum on the piping from the virgin and reclaim storage silos to the four (4) extruder feed hoppers. Conveying air from all four (4) hoppers is routed through discharges to the indoor atmosphere and therefore particulate emissions for this source considered insignificant.

FOAM EXTRUSION:

There are currently three (3) continuous extruders which mixes polystyrene virgin resin and repelletized resin with colorant and talc. This application incorporates the addition of a fourth extruder with a design production capacity of 750 lbs/hr. The blowing agent will be changed from Freon 22 to butane for all extruders and is injected (under pressure) into the extruder, where it is dispersed in the polymer mix. The polymer mix is cooled and forced through a die under controlled pressure. As the molten polymer exits the die, in the form of a tube, the dissolved blowing agent expands and boils, causing the plastic to foam. The tube is slit to form two sheets of foam which are wound into rolls. This product is called Standard Good Output (SGO). A portion of the butane contained in the foam material escapes inside the plant at this point. The total volatile organic compound (VOC) emissions from these four (4) sources are estimated to be 31.62 lb/hr; 132.80 ton/yr.

ROLL STOCK:

The foam that is wound into rolls from the extrusion stage is periodically removed and stored to "age" prior to being used in the thermoforming stage for a period of at least 72 hours. A portion of the butane that is contained in the foam escapes as a VOC emissions during this storage period, and is estimated to be 3.72 lb/hr; 15.62 ton/yr.

THERMOFORMING:

The aged rolls of foam are inserted into nine thermoformers which convert the rolls into finished product. A portion of the butane contained in the foam material escapes into the atmosphere as the products exit the thermoforming units. The total VOC emissions from these sources are estimated to be 4.65 lb/hr; 19.53 ton/yr.

REGRINDING OPERATION:

Scrap from the thermoforming operation and from the roll stock is ground and routed to the fluff silos. Particulate emission discharge inside the building. The total VOC emissions from this operation are 13.95 lb/hr; 58.59 ton/yr.

FLUFF STORAGE SILOS:

Under each thermoformer there is an enclosed grinder and blower which chops approximately 30% of the webbing and approximately 5% of the trimming from the finished product. The chopped foam is then air blown into the fluff silos which discharge individual dust collectors and the total emissions are estimated to be 0.014 lbs/hr, 0.06 tons/yr.

RECLAIM EXTRUDERS AND PELLETIZER:

One existing reclaim extruder and one new reclaim extruder are used to convert the fluff from the storage silos into a solid material by heating the fluff and then cooling it in a water trough and subsequently pelletized. This process forces the remaining 1% butane from the fluff. The particulate are uncontrolled and vent inside the building. The total VOC emissions from the output of these extruders are 0.93 lb/hr; 3.91 ton/yr.

RECLAIM RESIN STORAGE SILOS:

The reclaimed resin from the reclaim extruders and pelletizer are then pneumatically loaded into ten new reclaim silos (25 tons each). The silos are uncontrolled. The total particulate emissions are estimated to be 1.4 lb/hr; 5.9 ton/yr.

FINISHED PRODUCT TO CUSTOMER:

Finished product is stored in a separate warehouse for an average of four (4) weeks and then shipped to the customer. In accordance with studies conducted by the Radian Corp. (Report 68-02-3994) approximately 41% of the VOC content in the foam product remains for a period of twelve (12) months prior to dissipation.

LIN PAC

POTENTIAL EMISSION CALCULATIONS

PNEUMATIC CONVEYING OF VIRGIN POLYSTYRENE PELLETS FROM RAILROAD CAR TO VIRGIN STORAGE SILO.

Assumptions

Virgin silo capacity	=	2 @ 100 tons each
Polystyrene resin usage	=	2216.655 lb/hr; 9309.951 ton/yr
Uncontrolled Particulate Emission Factor	=	3 lb/ton (AP-42; 5.13-1)
Number of Silo Fillings	=	46.55 times/yr
Manufacturing Operating Hours	=	24 hr/day; 350 day/yr 8400 hr/yr

Particulate Emissions Calculations

200 ton x 3 lb/ton x 46.55 times/year	=	27,930 lb/yr uncontrolled
27,930 lb/yr / 8400 hr/yr x	=	3.3 lb/hr controlled
27,930 lb/yr / 2000 lb/ton x	=	14.0 ton/yr controlled

FOAM EXTRUDERS OUTPUT

Assumptions

Operating Hours	=	8400 hr/yr
% VOC Content Emitted At Extrusion Stage (Output)	=	34% (Radian Corporation Report 68-02-3994)
Butane Input To System	=	93.0 lb/hr

VOC Emissions Calculations

93.0 lb/hr x (0.34)	=	31.62 lb/hr
31.62 lb/hr x 8400 hr/yr / 2000 lb/ton	=	132.8 ton/yr

ROLL STOCK

Assumptions

Operating Hours = 8400 hr/yr

% VOC Content Emitted
at Roll Stock Stage = 4% (Radian Corp. Report
68-02-3994)

Butane Input To System = 93.0 lb/hr

VOC Emissions Calculations

$93.0 \text{ lb/hr} \times (0.04) = 3.72 \text{ lb/hr}$

$3.72 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 15.62 \text{ ton/yr}$

THERMOFORMING

Assumptions

Operating Hours = 8400 hr/yr.

% VOC Content Emitted
at Thermoforming Stage = 5% (Radian Corp. Report
68-02-3994)

Butane Input To System = 93.0 lb/hr.

VOC Emissions Calculations

$93.0 \text{ lb/hr} \times (0.05) = 4.65 \text{ lb/hr}$

$4.65 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 19.53 \text{ ton/yr}$

FLUFF STORAGE SILO WITH DISCHARGE OUTSIDE OF BUILDING

Assumptions

Operating Hours = 8400 hr/yr

Extrusion Product = 2325 lb/hr

% Roll Stock to Cone
Scrap Reject Hopper = 8% of Extrusion Product
(186.0 lb/hr)

% Thermoforming to Cone
Scrap Reject Hopper = 5% trim, 30% webbing
Total 35% of Roll Stock
Product (748.65)

Butane Input to System = 93.0 lb/hr

% VOC Content Emitted by Grinding Stage Emitted at Fluff Silos = 15% (Radian Corp. Report 68-02-3994)

Uncontrolled Particulate Emissions Factor = 3 lb/ton (AP-42; 5.13-1)

Efficiency of baghouse = 99.9%

Particulate Emissions:

2325 lb/hr x (0.08) = 186.0 lb/hr From Roll Stock

(2325 - 186) lb/hr x (0.35) = 748.65 lb/hr From Thermoforming

186.0 lb/hr + 748.65 lb/hr = 934.65 lb/hr Feed To Fluff Silos

$934.65 \text{ lb/hr} / 2000 \text{ lb/ton} \times 3 \text{ lb/ton} = 1.4 \text{ lb/hr uncontrolled}$

$1.4 \text{ lbs/hr} \times 0.01 = 0.014 \text{ lbs/hr controlled}$

$1.4 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} \times .01 = 0.06 \text{ ton/yr}$

VOC Emissions Calculations From Grinding

$93.0 \text{ lb/hr} \times (0.15) = 13.95 \text{ lb/hr}$

$13.95 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 58.59 \text{ ton/yr}$

RECLAIM EXTRUDER

Assumptions

Operating Hours = 8400 hr/yr

% VOC Content Emitted at Reclaimer Extruder = 1% (Radian Corp. Report 68-02-3994)

Butane Input To System = 93.0 lb/hr

VOC Emissions Calculations

$93.0 \text{ lb/hr} \times (0.01) = 0.93 \text{ lb/hr}$

$0.93 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 3.91 \text{ ton/yr}$

RECLAIM RESIN STORAGE SILOS

Assumptions

Operating Hours = 8400 hr/yr

Input to Reclaim Silos = approximately 933 lb/hr

Uncontrolled Particulate Emission Factor 3 lb/ton (AP-42; 5.13-1)

Particulate Emissions Calculations

$933 \text{ lb/hr} / 2000 \text{ lb/ton} \times 3 \text{ lb/ton} = 1.4 \text{ lb/hr controlled}$

$1.4 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 5.9 \text{ ton/yr controlled}$

BUTANE IN THE FINISHED PRODUCT TO CUSTOMER

Assumptions

Operating Hours = 8400 hr/yr.

% OC Content Emitted in
Product For 12 Months = 41% (Radian Corp. Report
68-02-3994)

Butane Input To System = 93.0 lb/hr

VOC Emissions Calculations

VOC's Retained in Product for up to 12 months

$93.0 \text{ lb/hr} \times (0.41) = 38.13 \text{ lb/hr}$

$38.13 \text{ lb/hr} \times 8400 \text{ hr/yr} / 2000 \text{ lb/ton} = 160.15 \text{ ton/yr OC's}$
Retained in Product

TABLE 1
VOC EMISSIONS SUMMARY
(see Figure 2)

EMISSION SOURCE	% OF BUTANE BLOWING AGENT	POUNDS PER HOUR	TONS PER YEAR
Extrusion	34.0	31.62	132.8
Roll Stock	4.0	3.72	15.62
Thermo-Forming	5.0	4.65	19.53
Regrinders To Fluff Silo	15.0	13.95	58.59
Reclaim Extruders	1.0	0.93	3.91
Total Plant Emissions:	59.0	54.87	230.45

Retained In Product:

For 12 Months	41.0	38.13	160.15
---------------	------	-------	--------

PARTICULATE SOURCES

DISCHARGING OUTSIDE BUILDING

EMISSION STACK GEOMETRY AND FLOW CHARACTERISTICS

SECTION III.H OF APPLICATION

<u>Source Description</u>	<u>Stack Height (Ft.)</u>	<u>Stack Dia. (Ft.)</u>	<u>ACFM</u>	<u>Relationship To Plot Plan</u>
Virgin Silos	62	1.7	500	1 & 2
Fluff Silos	38	1.7	500	3 thru 12
Reclaim Silos	38	.8	1000	13 thru 22

Information Supplies by Lin Pac, Inc., Sebring , Florida.

TABLE 2
PARTICULATE EMISSIONS SUMMARY

<u>EMISSION SOURCE</u>	<u>POUNDS PER HOUR</u>	<u>TONS PER YEAR</u>
Virgin Silos	3.3	14.0
Fluff Silo	0.014	0.06
Reclaim Silos	1.4	5.9
	-----	-----
Total Emissions	4.74	19.96

Allowable Emissions

Process weight equation:

Equation: $E = 3.59 P^{0.62}$ $P =$ is less than 30 tons/hr

Virgin
 Silos: $E = 3.59 (2217/2000)^{0.62} = 3.8 \text{ lbs/hr } 16.0 \text{ tons/yr}$

Fluff Silo: $E = 3.59 (935.2/2000)^{0.62} = 2.2 \text{ lbs/hr } 9.2 \text{ tons/yr}$

Reclaim Silos: $E = 3.59 (933/2000)^{0.62} = 2.2 \text{ lbs/hr } 9.2 \text{ tons/yr}$

Total 8.2 lbs/hr 34.4 tons/yr

LIN PAC PROCESS FLOW DIAGRAM

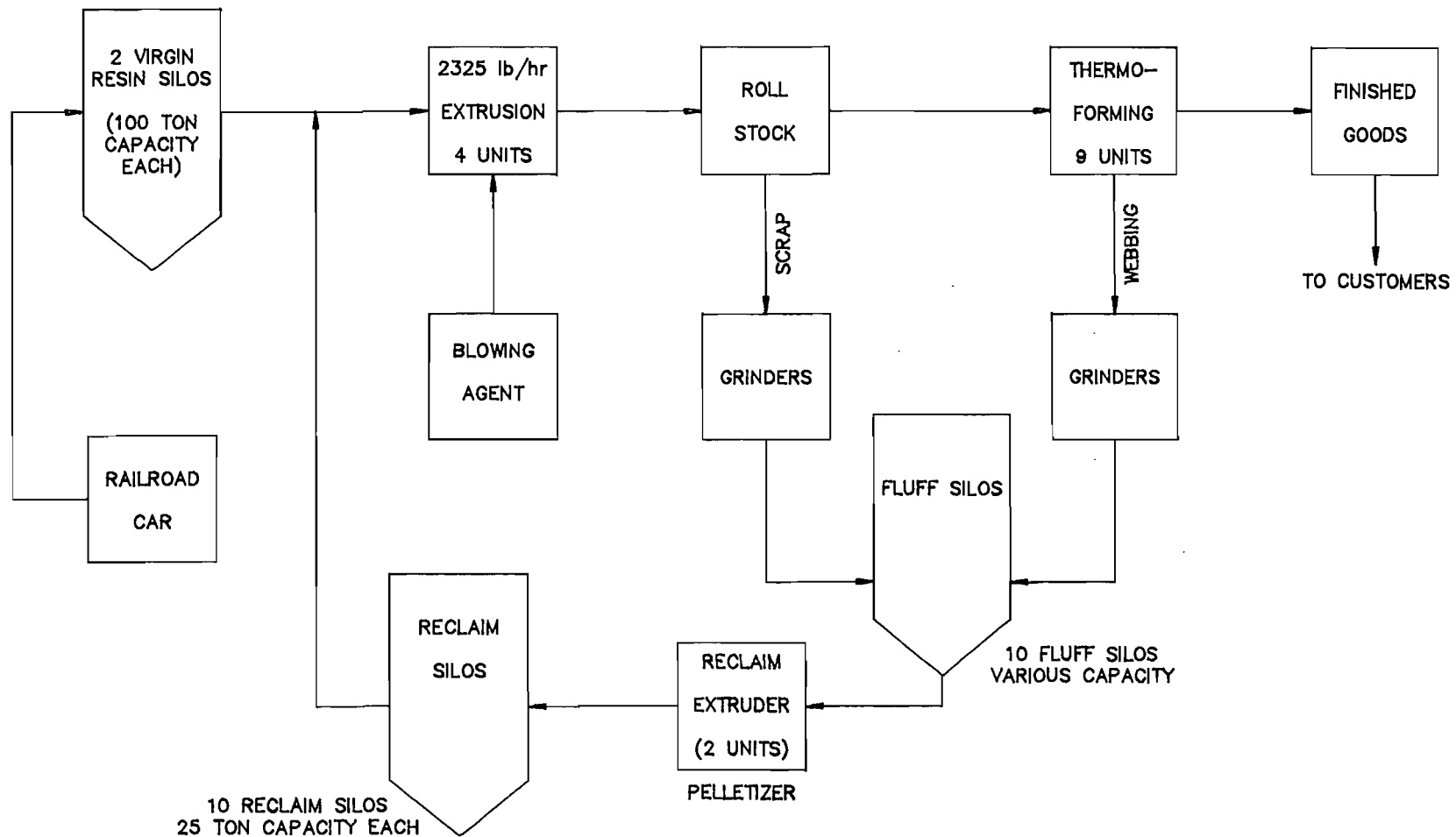


FIGURE - 1

LIN PAC PROCESS FLOW DIAGRAM

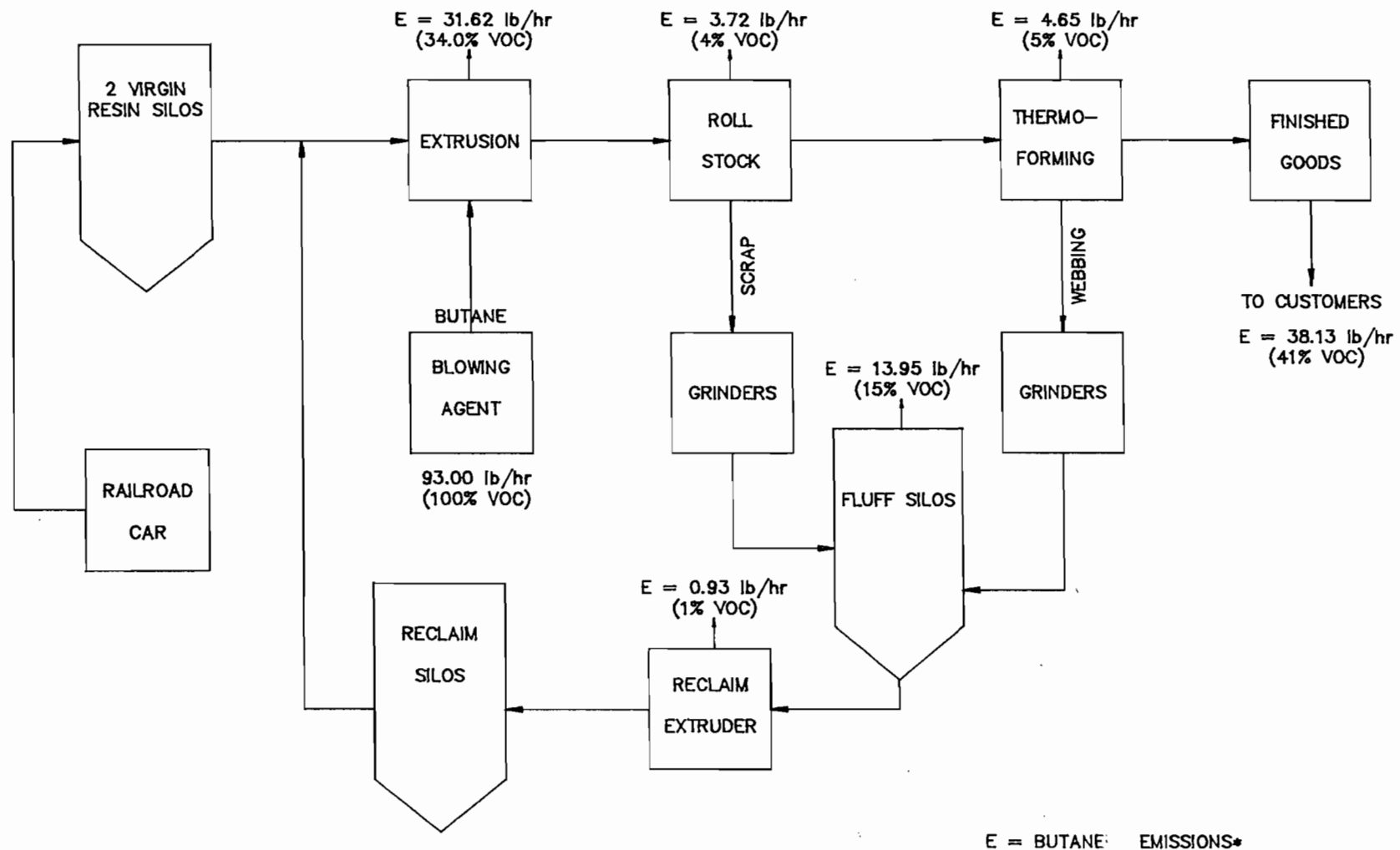


FIGURE - 2

MASS BALANCE
VOC EMISSIONS

* BASED ON EXTRUSION PRODUCTION OF 2325 lb/hr

LIN PAC PROCESS FLOW DIAGRAM

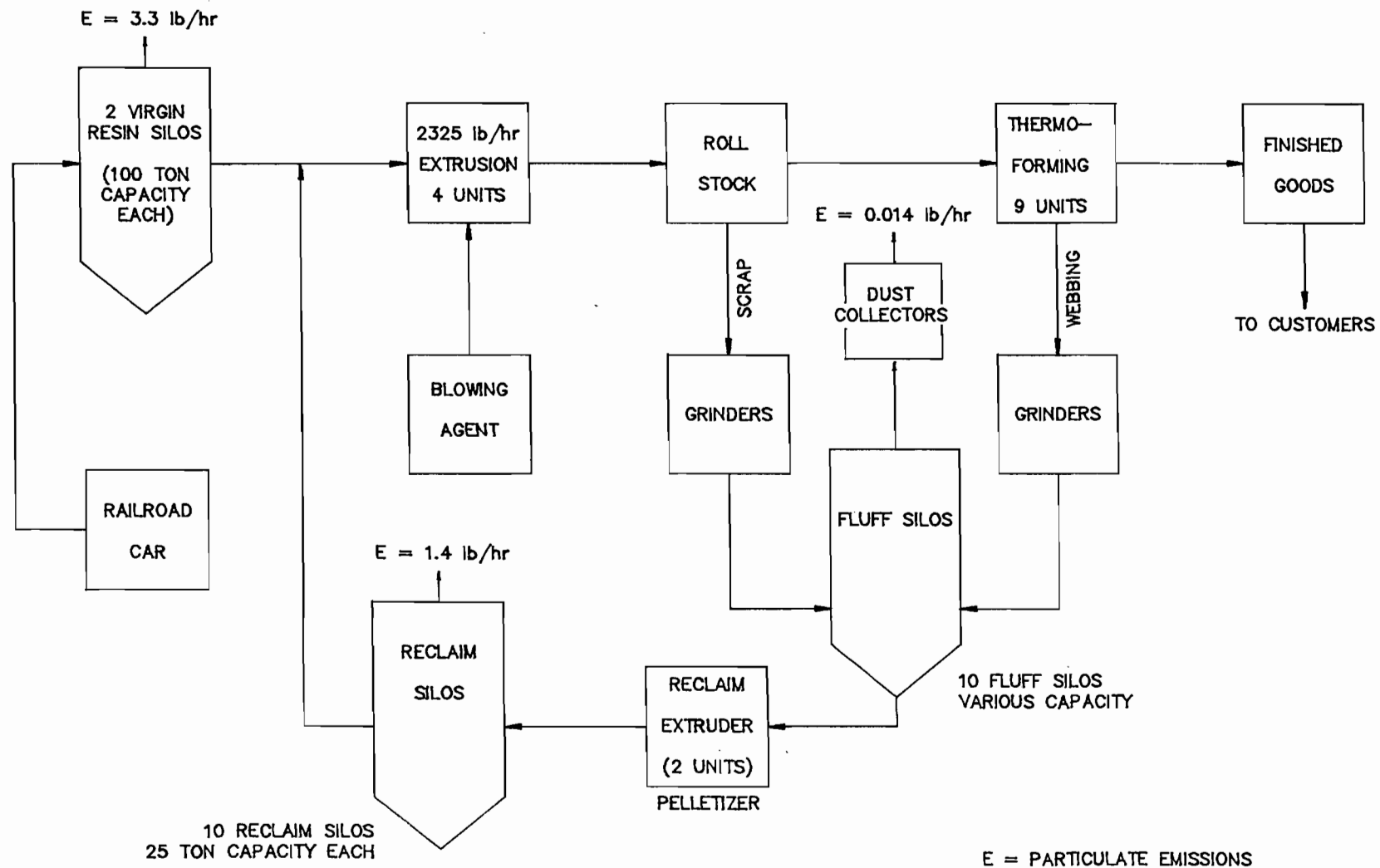


FIGURE - 3
PARTICULATE EMISSIONS

BULK

SYSTEMS

BEST AVAILABLE COPY

venting and Dust Collection Sack Tip Station

VDC 102

Silo Venting Filters

These filters are recommended for silos which are filled by a pneumatically discharged delivery vehicle. In such cases air delivery is about 500 scfm during delivery, but when the compressed air in the tanker is released at the end of its delivery cycle, a surge occurs causing an air flow three or four times greater for a short period.

To avoid break-through of dust particles it is essential to have a large filtration area. The Braby filter has an area of 22 square metres which is kept clean by reverse jet air pulsed either on a timed basis or by pressure differential. In the latter case the reverse jetting only takes place when necessary for the efficient operation of the filter and therefore is very economical in its use of compressed air.

This filter, as with all Braby filters, is mounted in an aluminium alloy casing to overcome the problems associated with the more usual mild steel units; rust, product contamination, maintenance and replacement costs.

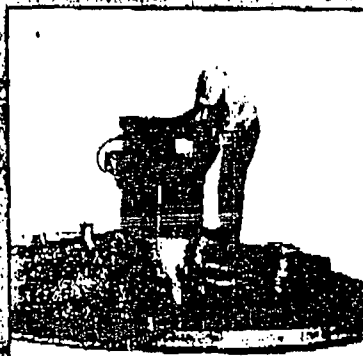
Filters are also available in stainless steel for use when site or product conditions dictate.



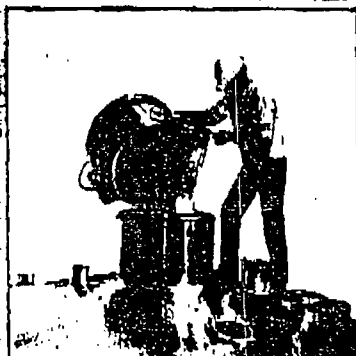
Braby Aluminium Silos fitted with Silo Venting Filters



CARTRIDGE REMOVAL AND REPLACEMENT TAKES SECONDS



Close up of filter



Inside top of filter with cartridge being removed

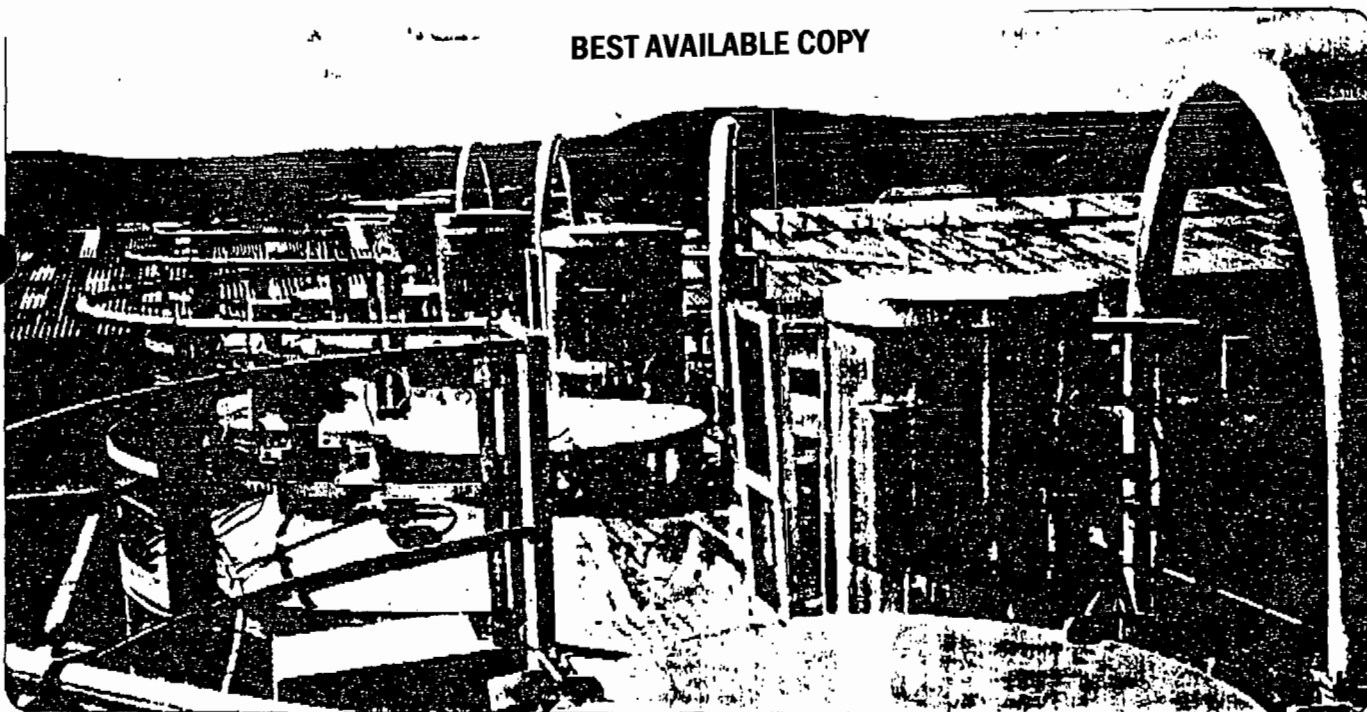


Cartridge being replaced

Braby Group Limited

Member of Anglo Nordic Group

Marchington Industrial Estate, Blunham Lane, Marchington, Uttoxeter, Staffordshire, England. ST14 8EF
Telephone: 0283 820711 Fax: 0283 820120 Telex: 9312131048 BB G



Pneumatic Conveying Filters

In addition to the Silo Vent Filter Braby manufacture a full range of reverse jet filters to suit air flows for low or high capacity pneumatic conveying systems. These filters are also housed in aluminium alloy casings and have all the same advantages of the Silo Vent Filter.

Displaced Air Filters

These low capacity units have been designed to provide a consistent venting facility where vessels are filled and emptied by gravity. They provide a more efficient operation and

eliminate the dust associated with the more usual dust socks making a cleaner plant.

Central Dust Collecting Systems

Braby filters are ideal for central dust collection systems associated with process plant, because of their high capacity, small size, ease of use and low maintenance costs.

A choice of fan size is offered. Braby engineers offer a design and installation service for these systems.

Sack Tip Station

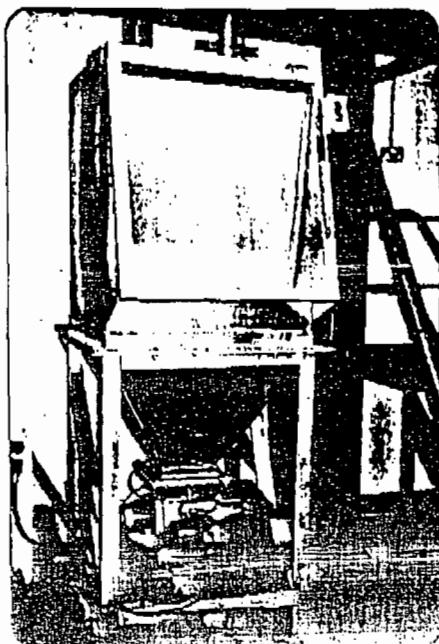
The Braby manual sack tip unit is constructed throughout in aluminium alloy for cleanliness, appearance and freedom from maintenance.

It is available for handling most granular and powdered products and can be fitted with its own venting filter or connected to a central dust collection system. It is the ideal unit for standby or regular use. A portable unit is also available which can be connected into a pneumatic or mechanical conveying system.

FIBC's

A version of the Braby Sack Tip Station is used for unloading FIBC's and comes complete with electric hoist.

Sack-Tip Station for minor ingredients



FIBC Unloading





WORLDWIDE



USA and Canada

Other Countries

Material Safety Data Sheet

n-BUTANE (Technical, Pure, Research, Polymerization, Commercial and Instrument Grades)

PHILLIPS 66 COMPANY
A Subsidiary of Phillips Petroleum Company
Bartlesville, Oklahoma 74004

PHONE NUMBERS

Emergency: _____
Business Hours (918) 661-3865
After Hours (918) 661-8118
General MSDS Information: _____
(918) 661-8327

A. Product Identification

Synonyms: Butane, normal Butane
Chemical Name: n-Butane
Chemical Family: Aliphatic Hydrocarbon
Chemical Formula: C₄H₁₀
CAS Reg. No.: 106-97-8
Product No.: P04300, P04400, P04941

Product and/or Components Entered on EPA's TSCA Inventory: YES

B. Hazardous Components

Ingredients	CAS Number	% By Wt.	OSHA PEL	ACGIH TLV
n-Butane	106-97-8	x	NE	800 ppm
Isobutane	75-28-5	x	NE	NE
Neopentane	463-82-1	x	NE	NE
Pentanes	NE	x	1000 ppm	600 ppm
Propane	74-98-61	x	1000 ppm	(Pentane) Simple Asphyxiant

* See Additional Comments (Section N) for exact composition.

C. Personal Protection Information

Ventilation: Use adequate ventilation to maintain exposure below the recommended exposure limit.

Respiratory Protection: Not generally required. If exposure to concentrations above the recommended exposure limit is possible, use NIOSH/MSHA approved self-contained breathing apparatus.

Eye Protection: Use safety glasses with side shields or face shield if exposure to compressed liquid or gas is possible.

Skin Protection: Rubber or other impervious gloves, if exposure to compressed liquid is possible. Launder contaminated clothing before reuse.

NOTE: Personal protection information shown in Section C is based upon general information as to normal uses and conditions. Where special or unusual uses or conditions exist, it is suggested that the expert assistance of an industrial hygienist or other qualified professional be sought.

D. Handling and Storage Precautions

Avoid inhalation and eye and skin contact. Wear protective equipment and/or garments described in Section C if exposure conditions warrant. Wash hands after handling.

Store in a cool, well-ventilated area away from ignition sources. Bond and ground during liquid transfer. Keep containers closed.

E. Reactivity Data

Stability:	Stable
Conditions to Avoid:	Not Established
Incompatibility (Materials to Avoid):	Oxygen and strong oxidizing agents
Hazardous Polymerization:	Will Not Occur
Conditions to Avoid:	Not Established
Hazardous Decomposition Products:	Carbon oxides formed when burned.

F. Health Hazard Data

Recommended Exposure Limits:

See Section B.

Acute Effects of Overexposure:

Eye: Vapors may cause mild irritation; liquofied gas may cause freeze-burns.

Skin: Vapors are not irritating; liquofied gas may cause freeze-burns.

Inhalation: Simple asphyxiant; dizziness, disorientation, headache, excitation, central nervous system depression, anesthesia.

Ingestion: Not a likely route; may cause freeze-burns to the mucous membranes and central nervous system depression.

Subchronic and Chronic Effects of Overexposure:

No known applicable information.

Other Health Effects:

No known applicable information.

Health Hazard Categories:

	Animal	Human		Animal	Human
Known Carcinogen	___	___	Toxic	___	___
Suspect Carcinogen	___	___	Corrosive	___	___
Mutagen	___	___	Irritant	___	___
Teratogen	___	___	Target Organ Toxin	<u>X</u>	<u>X</u>
Allergic Sensitizer	___	___	Specify -Eye and Skin Hazard-Freeze burns,		
Highly Toxic	___	___	Lung-Simple Asphixiant		

First Aid and Emergency Procedures:

Eye: Immediately flush eyes with water for at least 15 minutes. For freeze burns seek immediate medical attention. If irritation develops, seek medical attention.

Skin: Flush skin with water for 15 minutes. For freeze burns seek immediate medical attention. If irritation develops, seek medical attention.

Inhalation: Remove from exposure. If breathing ceases, administer artificial respiration followed by oxygen. Seek medical attention.

Ingestion: Seek immediate medical attention.

G. Physical Data

Appearance: Colorless liquefied petroleum gas
Odor: None (repulsive if odorant has been added)
Boiling Point: 31F (-1C)
Vapor Pressure: 37 psig (2670 mm Hg) at 100F
Vapor Density (Air = 1): 2.0
Solubility in Water: Negligible
Specific Gravity (H₂O = 1): 0.584 (60/60F)
Percent Volatile by Volume: 100
Evaporation Rate (Ethyl Ether = 1): >1
Viscosity: Not Established

H. Fire and Explosion Data

Flash Point (Method Used): -100F (-73C)(Estimated)
Flammable Limits (% by Volume in Air): LEL - 1.9
UEL - 8.5

Fire Extinguishing Media: Dry chemical, foam or carbon dioxide (CO₂).

Special Fire Fighting Procedures: Evacuate area of all unnecessary personnel. Use NIOSH/MSHA approved self-contained breathing apparatus and other protective equipment and/or garments described in Section C if exposure conditions warrant. Shut off source, if possible allow fire to burn until gas flow is shut off. Water fog or spray may be used to cool exposed containers and equipment.

Fire and Explosion Hazards: Carbon oxides formed when burned. Highly flammable vapors which are heavier than air may accumulate in low areas and/or spread along ground away from handling site.

I. Spill, Leak and Disposal Procedures

Precautions Required if Material is Released or Spilled:
Evacuate area of all unnecessary personnel. Wear protective equipment and/or garments described in Section C if exposure conditions warrant. Shut off source, if possible. Protect from ignition. Ventilate area thoroughly.

Waste Disposal (Insure Conformity with all Applicable Disposal Regulations):
Incinerate

J. DOT Transportation

Shipping Name: Liquefied Petroleum Gas
Hazard Class: Flammable Gas
ID Number: UN 1075
Marking: Liquefied Petroleum Gas/UN 1075
Label: Flammable Gas
Placard: Flammable Gas/1075
Hazardous Substance/RQ: Not Applicable
Shipping Description: Liquefied Petroleum Gas, Flammable Gas, UN 1075
Packaging References: 49 CFR 173.304, 173.306, 173.314 and 173.315

K. RCRA Classification - Unadulterated Product as a Waste

Ignitable

L. Protection Required for Work on Contaminated Equipment

Wear protective equipment and/or garments described in Section C if exposure conditions warrant. Contact immediate supervisor for specific instructions before work is initiated.

M. Hazard Classification

☒ This product meets the following hazard definition(s) as defined by the Occupational Safety and Health Hazard Communication Standard (29 CFR Section 1910.1200):

<input type="checkbox"/> Combustible Liquid	<input type="checkbox"/> Flammable Aerosol	<input type="checkbox"/> Oxidizer
<input type="checkbox"/> Compressed Gas	<input type="checkbox"/> Explosive	<input type="checkbox"/> Pyrophoric
<input checked="" type="checkbox"/> Flammable Gas	<input checked="" type="checkbox"/> Health Hazard (Section F)	<input type="checkbox"/> Unstable
<input type="checkbox"/> Flammable Liquid	<input type="checkbox"/> Organic Peroxide	<input type="checkbox"/> Water Reactive
<input type="checkbox"/> Flammable Solid		

☐ Based on information presently available, this product does not meet any of the hazard definitions of 29 CFR Section 1910.1200.

N. Additional Comments

Technical, Pure, Instrument
Research and Polymerization
Grades

Ingredient	% by Wt.
------------	----------

Butane	95-99.9
Related Compounds	0.1-5.0

Commercial Grade

Butane	94 (Min.)
Isobutane	3 (Max.)
Propane	0.3 (Max.)

As of the preparation date, this product did not contain a chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372.

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