



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

E-CORRESPONDENCE

foammakers@aol.com

Imperial Foam & Insulation Manufacturing Company, Inc.
2360 Old Tomoka Road
Ormond Beach, FL 32174

Re: PROPOSED Title V Air Operation Permit No.: 1270090-004-AV
Insulation Board Manufacturing Facility

Attention: Harry Merryday, Vice-President/General Manager

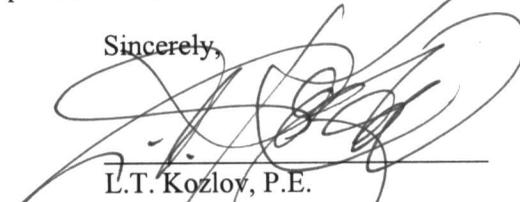
One copy of the "PROPOSED PERMIT DETERMINATION" for Imperial Foam & Insulation Manufacturing Company, Incorporated, Insulation Board Manufacturing Facility located at 2360 Old Tomoka Road, Ormond Beach, Volusia County, Florida, is enclosed. This proposed permit includes conditions for the operation of a polystyrene manufacturing facility that includes a steam-heated expander utilized to expand polystyrene beads to produce polystyrene logs that are cut into products.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was electronically mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any other questions, please contact Alan Zahm at 407/894-7555.

Sincerely,



L.T. Kozloy, P.E.
Program Administrator
Air Resources Management

az
LTK/azt

Enclosures

copy furnished to:

Veronica N. Sgro, EI, (vsagro@kooglerassociates.com)

Maxwell Lee, Ph.D., (mlee@kooglerassociates.com)

Barbara Friday, BAR, [Barbara.Friday@dep.state.fl.us] (for posting with Region 4, USEPA)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1270090-004-AV

Page 1 of 1

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" for the Imperial Foam & Insulation Manufacturing Company, Incorporated Insulation Board Manufacturing Facility located at 2360 Old Tomoka Road, Ormond Beach, Volusia County, Florida was clerked on March 21, 2007. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in "**The News-Journal**" newspaper on March 2, 2007. The PROPOSED Title V Air Operation Permit was available for public inspection at the permitting authority's office in Orlando. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on March 12, 2007.

II. Public Comment(s).

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the PROPOSED Title V Air Operation Permit becomes the PROPOSED Title V Air Operation Permit.

III. Conclusion.

(1) Since there were no comments received during the Public Notice period, no changes were made to the PROPOSED Title V Permit and the permitting authority hereby issues the PROPOSED Permit No.: 1270090-004-AV.

Imperial Foam & Insulation Manufacturing Company, Inc.
Insulation Board Manufacturing Facility

Facility ID No.: 1270090

Volusia County

Title V Air Operation Permit

PROPOSED Title V Operation Permit No.: 1270090-004-AV

Permitting Authority and Compliance Authority

Florida Department of Environmental Protection

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803

Telephone: 407/893-3334

Fax: 407/897-5963

Title V Air Operation Permit
PROPOSED Title V Operation Permit No.: 1270090-004-AV

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Central District
3319 Maguire Boulevard, Suite 232
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Permittee:

Imperial Foam & Insulation Mfg. Co., Inc.
2360 Old Tomoka Road
Ormond Beach, FL 32174

PROPOSED Permit No.: 1270090-004-AV

Facility ID No.: 1270090

SIC Nos.: 30

Project: Title V Air Operation Permit

The purpose of this permit is to issue the Title V Operation Permit. This existing facility is located at 2360 Old Tomoka Road, Ormond Beach, Volusia County; UTM Coordinates: Zone 17, 498.4 km East and 3235.5 km North; Latitude: 29° 15' 00" North and Longitude: 81° 10' 00" West.

STATEMENT OF BASIS: This Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix H-1, Permit History/I.D. Number Changes
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/2006

Effective Date:	TBD
Application Due Date:	December 30, 2011
Expiration Date:	June 30, 2012

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/azt

SPECIFIC CONDITIONS

Section I. Facility Information.

Subsection A. Facility Description.

The permittee may operate a polystyrene manufacturing operation that includes a steam-heated expander utilized to expand polystyrene beads to produce polystyrene logs that are cut into products.

The two steam boilers at the facility that are rated at 2.5 million BTU/HR.

Based upon the Title V permit application received December 29, 2006, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No./Brief Description

001 Insulation Board Manufacturing

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:
Combined Air Construction and Title V Permit Application received December 29, 2006.

SPECIFIC CONDITIONS

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a) The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018
 - b) The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

SPECIFIC CONDITIONS

To comply, procedures to minimize pollutant emissions shall include the following:

- a) tightly cover or close all VOC containers when they are not in use,
- b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
- c) maintain all piping, valves, fittings, etc. in good operating condition,
- d) prevent excessive air turbulence across exposed VOC's,
- e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Maintenance of paved areas as needed;
- b) Regular mowing of grass and care of vegetation;
- c) Limited access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c), F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. &3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Ste 232
Orlando, Florida, 32803
(407) 894-7555

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxic Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

SPECIFIC CONDITIONS

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62.213.420(4), F.A.C.]

13. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", including the Emissions Report, shall be completed for each calendar year, **on or before March 1** of the following year and submitted to Orange County EPD. [Rule 62-210.370(3), F.A.C.]

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090(1), F.A.C.]

SPECIFIC CONDITIONS

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No./ Brief Description

001 Insulation Manufacturing

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. Capacity. The maximum facility-wide bead usage rate is not limited. [Rule 62-210.200, (PTE), F.A.C., construction permit 1270090-003-AC]

A2. Hours of Operation. Continuous operation is allowed.
[Rule 62-210.200, (PTE), F.A.C., construction permit 1270090-003-AC]

Emission Limitations and Standards

A3. The maximum facility wide combined volatile organic compound (VOC) emission rate is limited to less than 245 tons per twelve consecutive months and all HAP emissions are limited to less than 245 tons per consecutive twelve months and updated monthly, as requested by the applicant. [Rule 62-210.200, (PTE), F.A.C., construction permit 12700909-003-AC]

Recordkeeping and Reporting Requirements

A4. In order to demonstrate compliance with specific conditions number **A1.** and **A3.**, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

- a) month
- b) Consecutive 12 month total of bead usage for emission calculations.
- c) The percent of pentane in each lot of beads
- d) Manufacturer's certification of pentane content in each lot of beads
- e) Quarterly test for pentane by manufacturer of each type of bead
- f) Facility-wide VOC and all HAP's.

[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12 month total treats each month of the year as the end of a 12 month period. A 12 month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

SPECIFIC CONDITIONS

A5. VOC emission rate deduction for pentane that leaves the facility within the insulation can be calculated under the following concepts. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years and made available to the Department. Daily logs shall be completed within seven business days and the monthly logs shall be completed by the end of the following month.

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

A.6. The Second Expander. The expander needs to be operational and tested by August 1, 2010. The required testing is a EPA Method 9 per Rule 62-296.320(4)(b) F.A.C. with an Opacity limit of less than 20%. The testing needs to be complete by and have test results submitted by January 15, 2011 and be fully operational by January 30, 2011.

1 of many

APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); and, Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations; Applications.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require. (2) All applications and supporting documents shall be filed in quadruplicate with the Department. (3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them. (4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C. (5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section. (b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant by certified mail that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification. (c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin. (d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application. (e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee. (6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review. (7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C. [Rule 62-4.050, F.A.C.]

3. Standards for Issuing or Denying Permits. Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following: (also, see Condition No. 38.) (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship. (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S. (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards. (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance. (2) A permittee may request a modification of a permit by applying to the Department. (3) A permittee may request that

Appendix H-1, Permit History/ID Number Changes

Imperial Foam & Insulation Manufacturing
Insulation Manufacturing Facility

PROPOSED Permit No.: 1270090-004-AV
Facility ID No.: 1270090

Permit History (for tracking purposes):

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
001	Insulation Manufacturing	1270090-003-AV	March, 20, 2007	February 28, 2011
001	Insulation Manufacturing	1270090-002-AO	April 30, 2002	February 28, 2007
001	Insulation Manufacturing	1270090-001-AO	January 17, 1997	January 30, 2002

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Imperial Foam & Insulation Manufacturing
Insulation Board Manufacturing Facility

PROPOSED Title V Permit No. 1270090-004-AV
Facility ID No. 1270090

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Two natural gas fired boilers, each at 2.5 mmBtu/hr.

STATEMENT OF BASIS

Imperial Foam & Insulation Manufacturing
Insulation Board Manufacturing Facility
Facility ID No.: 1270090
Volusia County

PROPOSED Title V Permit No.: 1270090-004-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

Based on the initial Title V permit application received December 29, 2006, this facility is a major source of hazardous air pollutants (HAPs). It is noted that the application says it is a major for HAPs as it emits pentane, yet pentane does not appear defined as a HAP. The facility has an emission limit of 245 tons per year and is not a PSD source. Also included in this permit are miscellaneous insignificant emission units and/or activities.

The permittee may operate a polystyrene manufacturing operation that includes a steam-heated expander utilized to expand polystyrene beads to produce polystyrene logs that are cut into products. The two steam boilers at the facility that are rated at 2.5 million BTU/HR.

The applicable emission limitations are as follows:

- a) **Facility Wide General Particulate Emission Standard**
Rules 62-296.320(4)(b)1. & 4., F.A.C.
- b) **Facility Wide General VOC Standard per Rule 62-296.320(1)(a), F.A.C.**
- c) **Facility Wide Objectionable Odor Prohibited per Rule 62-296.320(2), F.A.C.**