FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803

RICK SCOTT
GOVERNOR

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SECRETARY

Electronically Sent- Received Receipt Requested
marcos.garibay@kingspan.com

FINAL PERMIT

PERMITTEE

Kingspan Insulated Panels, Inc.
725 Summerhill Drive
DeLand, FL 32724

Authorized Representative:
Mr. Marcos Garibay, Polymer Engineer

Air Permit No. 1270174-005-AF
Permit Expires: 07/30/2015
Kingspan Insulated Panels Facility
Federally Enforceable State
Operating Permit (FESOP) Revision
Project Name: Permit Revision

This is the final federally enforceable state air operation permit number 1270174-005-AF to operate the above-referenced source issued pursuant to Section(s) 403.087, Florida Statutes. It replaces 1270174-003-AF and 1270174-005-AC. This permit retains the expiration date of 1270174-003-AF, which is July 30, 2015.

This permit authorizes operation of emission units at an insulated foam panel manufacturing facility. The manufacturing is conducted at the Kingspan Insulated Panels Facility (Standard Industrial Classification No. 3086). The facility is located in Volusia County at 725 Summerhill Drive in DeLand, Florida. The UTM coordinates are Zone 17, 471.7 km East, and 3215.3 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the 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 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

June 24, 2013

F. Thomas Lubozynski, P.E. Date
Waste and Air Resource Programs Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on June 24, 2013 to the persons listed below.

Marcos Garibay, Polymer Engineer, Kingspan Insulated Materials (**marcos.garibay@kingspan.com**)
Sara Greivell, Grove Scientific & Engineering Company, **(sara@grovescientific.com**)
James T. Show, P.E. (**j_sshow@bellsouth.net**)
Ana M. Oquendo, EPA, **(oquendo.ana@epa.gov**)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

June 24, 2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of the following emissions units.

Facility ID No. 1270174	
ID No.	Emission Unit Description
001	Polyurethane Foam Panel Manufacturing Facility.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. Prevention of Significant Deterioration, F.A.C.
- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs).

PERMIT HISTORY/AFFECTED PERMITS

Revises Permit No. 1270174-003-AF to incorporate terms and conditions of Construction Permit 1270174-004-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Waste & Air Resource Programs. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Waste & Air Resource Programs
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us**. In any electronic submittal clearly identify the Air Permit No. 1270174-005-AF.

2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Central District Compliance Assurance Program. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program (Use the above mailing or e-mail address).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions; and,
   c. Appendix C. Common Conditions

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," (AOR) for the preceding calendar year. The report must be submitted electronically in accordance with the instructions received with the AOR package sent by the Department. Go to the following website for the latest information about electronic submittal of AORs: http://www.dep.state.fl.us/air/emission/eaor/default.htm

   [Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

   c. copies of the most recent two months of records/logs specified in Specific Condition No. **A.7**.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 - Polyurethane Foam Panel Manufacturing

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Polyurethane Foam Panel Manufacturing - The existing plant manufactures metal-laminated, polyurethane foam panels. These panels are used as an insulating material for buildings, roofs, refrigeration units, garage doors, etc. The metal received by the facility is inspected, embossed, and stored as a roll until ready to use. Two raw materials are currently used to make the foam core for the laminate; Isocyanate and a polyol compound. An 80/20 cyclopentane/isopentane mix is used as a blowing agent which, when sprayed, changes phase from a liquid to a gas and forms the closed-cell foam. The facility also includes a pyrolysis oven (installed under Construction Permit 1270174-004-AC) to clean metal hangers and metal pokers used in the foam panel production process. The hangers are coated with dried polyurethane foam, the metal pokers are coated with wet 4,4'- methyl diphnyl diisocyanate. The oven is a Pollution Control Products Co., gas-fired, Model IGG-71 with a maximum heat input rating of 3 million British thermal units per hour (MMBtu/Hr). The oven contains primary and secondary burners which both operate continuously during the first stage of the cleaning process. A fine water spray controls the processing temperature until the pyrolysis stage of the cleaning process is over. Plastics and polymers that will melt are collected in a catch pan and drained from the furnace. The remaining polymers are volatilized to form smoke which is controlled by the secondary combustion chamber. The secondary combustion chamber has a minimum operating temperature of 1400°F and a maximum operating temperature of 1600°F. Foam cutting (using routers) and sawing operations are performed in enclosed areas, within the manufacturing area. Air from each enclosure is vented to a baghouse and the exhaust air is discharged inside the facility

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: Material usage at the facility shall be limited to the following:

Material	Maximum Permitted Annual Usage
isocyanate	9,850 tons/consecutive 12 months
polyol	4,820 tons/consecutive 12 months
cyclo/isopentane	610 tons/consecutive 12 months

[Construction Permit 1270174-001 AC dated 08/20/2002 and Rule 62-210.200(247) "Potential to Emit", F.A.C.]

A.2. Authorized Fuel: The burners used to heat the metal sheets shall be fired with propane or natural gas only.

[Construction Permit 1270174-001 AC, dated 08/20/2002 and Rule 62-210.200(247) "Potential to Emit", F.A.C.]

A.3. Authorized Fuel: The oven is permitted to fire natural gas only.
[Construction Permit 1270174-004 AC, dated 11/26/12 and Rule 62-210.200(247) "Potential to Emit", F.A.C.]

A.4. Restricted Operation: The hours of operation are not limited (8,760 hours per year)
[Rules 62-4.070(3) and 62-210.200(247) "Potential to Emit", F.A.C.]

EMISSIONS STANDARDS

A.5. VOC/Hazardous Air Pollutant (HAP) Emission Limitation: The facility-wide VOC/HAP emissions shall not exceed the following during any consecutive 12-month period:

Pollutant	Emissions Limitation (tons per any consecutive 12-month period)
Total VOCs	Less than 40.0
Total HAPs	Less than 25.0
Individual HAPs	Less than 10.0

[Construction Permit 1270174-001 AC dated 08/20/2002 and Rule 62-210. 200(247), "Potential to Emit," F.A.C]

A.6. Visible Emissions: Visible emission from the facility shall be less than 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C.]

RECORDS AND REPORTS

A.7. Monthly Log: In order to demonstrate compliance with Specific Conditions **A.1.** and **A.5.,** 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. [Rule 62-4.070(3) and Chapter 62-210, F.A.C.]

The monthly summary of the log, at a minimum, shall contain the following:

1. Facility Name, Facility ID No. (i.e., Kingspan Insulated Panels, Inc., Facility # 1270174);
2. Designation of the month and year of operation for which the records are being tabulated;
3. Monthly and consecutive 12-month totals of isocyanate, polyol and cyclo/isopentane material usage;
4. Monthly total of total VOC and HAPs emissions in tons/month. The log must include the calculations and supporting documents relied upon to determine the total emitted.

5. Consecutive 12-month total of VOC emissions. The facility shall use the emission factor for cyclo/isopentane of 4.3 percent as developed in the most recent Modified Method 25D emission factor test conducted in October 2010 ; and,
6. Consecutive 12-month total of total HAPs emissions and each individual HAP emission.

The monthly logs shall be completed no later than the end of the following month.

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 consecutive 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 is available until such a time as a consecutive 12-month total can be maintained each month.

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. The monthly logs shall be completed by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

A.8. Daily Visual Inspection: Daily the permittee shall visually inspect tanks, baghouses, and piping for leaks or any other abnormalities. Any problems shall be noted in the operations and maintenance log and the condition shall be corrected as soon as possible.
[Operation Permit 1270174-003-AF and Rule 62-4.070(3), F.A.C.]