Sarasota County

NOTICE OF PERMIT ISSUANCE

September 25, 2013

Electronic Mail
Received Receipt Requested

CERTIFIED MAIL #70122920 0000 2192 0342
RETURN RECEIPT REQUESTED

PERMITTEE:
Millennium Coating, LLC
c/o ASO Corp., LLC
300 Sarasota Center Boulevard
Sarasota, FL 34240-9381

Air Permit No.:	1150169-003-AO
County:	Sarasota
Expiration Date:	September 25, 2018

Authorized Representative:
Steve Walter, Vice President of Coating Operations

Millennium Coating, LLC
Minor Source Air Operating Permit
Project: Pressure Sensitive Tape Converting Line

Dear Mr. Walter:

This is the final air operation permit, which authorizes the operation of Millennium Coating, LLC, which is a pressure sensitive tape converting line (Standard Industrial Classification No. 2672), that manufactures white release paper - adhesive coated plastic/ fabric material (i.e., three layer material: white release paper – adhesive – plastic or fabric substrate) used to make adhesive bandages and similar products for medical and consumer markets. The facility is located in Sarasota County at 306 Sarasota Center Blvd., Sarasota, FL 34240-9381. The UTM coordinates are Zone 17, 361.03 km East, and 3025.48 km North.

This final permit is organized by the following sections:

Section 1. General Information
Section 2. Administrative Requirements
Section 3. 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 operation 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 operate the facility in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of the County Attorney, 1660 Ringling Boulevard, Sarasota, Florida 34236. Under Rule 62-110.106(4), Florida Administrative Code, a person may request an extension of the time for filing a petition for an administrative hearing. The request must be filed (received) in the Office of the County Attorney before the end of the time period for filing a petition for an administrative hearing.

Petitions by the applicant or any of the persons listed below must be filed within fourteen days of receipt of this written notice. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), Florida Statutes, must be filed within fourteen days of publication of the notice or within fourteen days of receipt of the written notice, whichever occurs first. Section 120.60(3), Florida Statutes, however, also allows that any person who has Sarasota County Natural Resources (SCNR), Air & Water Quality for notice of agency action may file a petition within fourteen days of receipt of such notice, regardless of the date of publication. The 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 or request for an extension of time within fourteen days of receipt of notice shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, Florida Statutes. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code.

A petition that disputes the material facts on which SCNR's action is based must contain the following information, as indicated in Rule 28-106.201, Florida Administrative Code:

(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 determination;
(c) A statement of when and how the petitioner received notice of SCNR's 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 SCNR's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of SCNR's proposed action; and

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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that SCNR'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 SCNR have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under Section 120.573, Florida Statutes, is not available for this proceeding.

This permit action is final and effective on the date filed with the Clerk of the Office of the County Attorney unless a petition (or request for an extension of time) is filed in accordance with the above. Upon the timely filing of a petition (or request for an extension of time), this permit will not be effective until further order of SCNR.

Any party to this Order (air permit) has the right to seek judicial review of the Order 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 Office of the County Attorney, 1660 Ringling Boulevard, Sarasota, Florida 34236; 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 thirty (30) days from the date this Order is filed with the Clerk of the Office of the County Attorney.

Executed in Sarasota, Florida.

SARASOTA COUNTY NATURAL RESOURCES
AIR & WATER QUALITY

Michael Storino
Environmental Specialist III
Sarasota County Natural Resources
Air & Water Quality

John T. Hickey, P.E.
Manager
Sarasota County Natural Resources
Air & Water Quality

JTH/MFS/mfs

Enclosure

S13PC.002

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this Notice of Final Air Permit package was mailed by certified mail before the close of business on ***September 25, 2013*** to:

Steve Walter, Vice President of Coating Operations, Millennium Coating, LLC, 306 Sarasota Center Blvd., Sarasota, FL 34240-9381; swalter@asocorp.com

The undersigned duly designated deputy clerk hereby certifies that this Notice of Final Air Permit package 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 ***September __, 2013*** to the persons listed below:

Cc: Bill Muth Jr., Director of Continuous Improvement, ASO, LLC, 300 Sarasota Center Blvd., Sarasota, FL 34240; bmuth@asocorp.com

Sara Greivell, Project Manager, Grove Scientific & Engineering Company, 6140 Edgewater Drive, Suite F, Orlando, FL 32810; sara@grovescientific.com

Susan Machinski, *Engineering Specialist*, FDEP S District, 2295 Victoria Ave, Suite 364, P.O. Box 2549, Ft. Myers, FL 33902-2549; Susan.Machinski@dep.state.fl.us

David M. Pearce, *Attorney*, Sarasota County Office of the County Attorney; dpearce@scgov.net

Melissa L. Wagar, Sarasota County Office of the County Attorney; mwagar@scgov.net

Clerk Stamp

SARASOTA COUNTY
AIR QUALITY

SEP 25 2013

STORAGE TANK MGMT.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated SCNR Clerk, receipt of which is hereby acknowledged.

Clerk — ***September 25, 2013*** Date

SECTION 1. GENERAL INFORMATION

PERMITTEE:		Permit No.:	1150169-003-AO
Millennium Coating, LLC		County:	Sarasota
306 Sarasota Center Blvd.		Effective Date:	September 30, 2013
Sarasota, FL 34240-9381		Expiration Date:	September 30, 2018
		Project:	Pressure Sensitive Tape Converting Line

FACILITY AND PROJECT DESCRIPTION

This air operation permit (permit 1150169-003-AO) authorizes operation of a facility, which is a pressure sensitive tape converting line (Standard Industrial Classification No. 2672), that manufactures white release paper - adhesive coated plastic/ fabric material (i.e., three layer material: white release paper – adhesive – plastic or fabric substrate) used to make adhesive bandages and similar products for medical and consumer markets. The facility is located in Sarasota County at 306 Sarasota Center Blvd., Sarasota, FL 34240-9381. The UTM coordinates are Zone 17, 361.03 km East, and 3025.48 km North. The facility consists of the following emissions units.

Facility ID No. 1150169	
ID No.	**Emission Unit Description**
001	Pressure Sensitive Tape Coating/Converting Line

A 62.5-inch wide white release paper roll is unwound and fed to the coating/ converting line at a line speed of 130 feet/ minute where it will receive 655 lbs adhesive/ hour. The adhesive coated quick release paper web is dried in a 72 foot oven and then married to the unwound plastic/ fabric bandage substrate in the pressure laminator. This is where the adhesive is transferred from the white release paper to the plastic/ fabric substrate material. The resultant joined product (i.e., white release paper – adhesive coated plastic/ fabric substrate) is rewound and cut for use in the bandage making/ wrapping machine.

The adhesive coating/ converting line with adhesive day tank and slot die coating head will be located in an adhesive permanent total enclosure (APTE). Emissions from the APTE and drying oven will be vented to an 8,000 scfm GLENRO REGENEX™ Regenerative Thermal Oxidizer (RTO). Heat from the RTO will be recycled back to the drying oven via a main mixing box. The RTO, mixing box and oven are an integrated system. The mixing box and RTO are each equipped with a 2 MMBtu/hr burner (e.g., a total of 4 MMBtu/hr). The fuel used for combustion will be natural gas.

SECTION 1. GENERAL INFORMATION

The RTO will capture 100% of converting line and oven VOC emissions (~1,106.34 tpy). The destruction efficiency will be certified by the manufacturer to be 99%, with resultant controlled VOC emissions of 11.06 tpy.

Methyl Ethyl Ketone will be used as the cleanup solvent. It is assumed that 100% of cleanup solvent VOC emissions (~0.93 tpy) are vented uncontrolled to the atmosphere.

The facility will operate a Reddy~Buffaloes Pump Co., Inc. Model #6 x 6 DF emergency electric fire pump. The fire pump is exempt from permitting under Rule 62-210.300(3) (a.)(15.), F.A.C. The fire pump motor will be an induction motor (i.e., electric) rated for 100 hp at 460 volts alternating current (VAC).

Operational design of the facility will ensure that emissions of particulate matter (PM and PM-10), carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO2), VOC (Volatile Organic Compounds), and HAP(s) (Hazardous Air Pollutant(s)) are below the Title V permitting thresholds of Chapter 62-213, F.A.C. The facility will be classified as a Minor Facility as defined by Rule 62-210.200(201), F.A.C.:

> Minor Facility: Any facility that is not a major facility.

The facility is subject to New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR Part 60 Subpart RR.

The conditions of this permit will ensure emissions remain below the Title V permitting thresholds of Chapter 62-213, F.A.C.

FACILITY REGULATORY CLASSIFICATION

Subject to:	Y/N
Rule 62-212.300, Stationary Sources – Preconstruction Review, General Preconstruction Review Requirements, F.A.C.[1]	**Y**
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C[2]	N
Rule 62-296.320, Stationary Sources – Emission Standards – General Pollutant Emission Limiting Standards, F.A.C.[3, 4]	**Y**
Rule 62-296.500, Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities[5]	N
Rule 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter[6]	N
Rule 62-204.800(8), Stds. of Performance for New Stationary Sources, F.A.C.[7] (NSPS)	**Y**
Rule 62-204.800(9), Title 40 CFR Part 60, Emission Guidelines and Compliance Times[8]	**Y**
Rule 62-204.800(10), Natl. Emission Stds. for Hazardous Air Pollutants, F.A.C.[9] (NESHAPS)	N
Rule 62-204.800 (11) National Emission Standards for Hazardous Air Pollutants for Source	N

SECTION 1. GENERAL INFORMATION

Categories F.A.C. [10] (NESHAPS for Source Categories)	
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C. [11]	N
Rule 62-297.310, Stationary Sources – Emissions Monitoring - General Compliance Test Requirements, F.A.C.[12]	**Y**

1. Facility ***is not*** exempt from general permitting requirements.
2. Facility ***is*** PSD minor source.
3. Facility ***may be*** a source of unconfined particulate matter.
4. Facility ***may be*** a source of odors.
5. Facility ***is not*** located in an ozone nonattainment or air quality maintenance area.
6. Facility ***is not*** located in a PM air quality maintenance area or in the area of influence of such an area.
7. Facility ***is*** subject to 40 CFR Part 60 Subpart RR NSPS for Pressure Sensitive Tape and Label Surface Coating Operations.
8. Facility ***is*** subject to 40 CFR Part 60 Air Pollution Control, General Provisions Emission Guidelines and Compliance Times, F.A.C.
9. Facility ***is not*** subject to 40 CFR Part 61 NESHAPS.
10. Facility ***is not*** subject to 40 CFR Part 63 Subpart JJJJ NESHAPS for Paper and Other Web Coating.
11. Facility ***is*** Minor. This facility is not a major source of hazardous air pollutants (HAPs) (i.e. potential emissions of HAPs are less than 10 TPY for any single HAP and 25 TPY for total combined HAPs).
12. Compliance testing ***is not*** required annually.

PERTINENT DOCUMENTS:

Original air pollution construction permit application dated June 9, 2011.

1150169-001-AC Original stationary source of air pollution construction permit.

1150169-002-AC Air Construction Permit Modification

Facility Information Summary:

Site/Location: Millennium Coating, LLC; 306 Sarasota Center Blvd., Sarasota, Sarasota County, Florida 34240-9381

UTM: 17-361.03 E 3025.48 N Latitude: 27°20'43.5480" Longitude: 82°24'17.6544"

Facility ID No: 1150169 Emission Unit (EU) ID No.: 001 - Pressure Sensitive Tape Converting Line

Note: Please reference Permit No. and Emission Unit (EU) ID No. in all correspondence, test report submittals, applications, etc.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is Sarasota County Natural Resources (SCNR), Air & Water Quality. SCNR's mailing address is: SCNR Air & Water Quality; 1001 Sarasota Center Blvd. Sarasota; Sarasota, Florida 34240. All documents related to applications for permits shall be submitted in triplicate to SCNR.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to SCNR. The mailing address and phone number are: SCNR Air & Water Quality; 1001 Sarasota Center Blvd.; Sarasota, Florida 34240; (941)861-0675.

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

   Appendix A. Citation Formats and Glossary of Common Terms;

   Appendix B. General Conditions;

   Appendix C. Common Conditions;

   Appendix D. Common Testing Requirements;

   Appendix E. 40 CFR 60 Subpart RR NSPS for Pressure Sensitive Tape and Label Surface Coating Operations; and,

   Appendix F. 40 CFR 60 Subpart A General Provisions.

4. Applicable Regulations, Forms, and Application Procedures: All applicable rules and design discharge limitations specified in the application shall be adhered to. The facility is subject to all applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297. Issuance of this permit does not relieve the permittee from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Florida Department of Environmental Protection (DEP), SCNR or any other such requirements under Federal, State, or Local law. [Rules 62-210.300 and 62-4.070(7), F.A.C.]

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

6. Modification: Any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. No emissions unit or facility shall be constructed or modified without obtaining an air construction permit from SCNR prior to the beginning of construction or modification. [40 CFR 60.14, Rules 62-4.030, 62-4.070(3), 62-4.080(2), 62-210.300(1) and 62-212.300(1), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

7. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]

8. Rule Compliance: A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. [Rule 62-296.100(3), F.A.C.]

9. Renewal: Prior to sixty (60) days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty (60) days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by SCNR. [Rule 62-4.090, F.A.C.

This section of the permit addresses the following emissions unit:

Emissions Unit ID No.	*Description*
001	Pressure Sensitive Tape Converting Line

PERFORMANCE RESTRICTIONS

1) Permitted Capacity: Line speed of 130 feet/minute; Adhesive usage rate of 655 lbs/hour; 60 inch wide web. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.200(247), F.A.C.]

2) Authorized Fuel: Fuel used for the RTO and mixing box shall be limited to natural gas. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.200(247), F.A.C.]

3) Restricted Operation: The hours of operation of are not limited (8760 hours per year). Minimum RTO Combustion chamber temperature of 1600 degrees F. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.200(247), F.A.C.]

4) Emissions Control System: The RTO shall be designed to capture 100% of the converting line and oven VOC emissions. The destruction efficiency shall be certified by the manufacturer to be no less than 99%. At a minimum, the RTO shall destroy 90% of captured VOC emissions. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.650, F.A.C.]

5) Operation & Maintenance: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. [40 CFR 60.11(d), Permit Nos. 1150169-001-AC, 1150169-002-AC]

6) Circumvention: The permittee shall not circumvent any air pollution control devices or allow the emissions of air pollutants without the air pollution control device (i.e., GLENRO REGENEX™ Regenerative Thermal Oxidizer (RTO)) operating properly. The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12, Permit Nos. 1150169-001-AC, 1150169-002-AC, Rules 62-210.650 and 62-210.700(4), F.A.C.]

EMISSIONS STANDARDS

7) Emissions Standards: The permittee shall …

   a. Limit VOC emissions to 0.20 kg VOC/ kg of coating solids applied as calculated on a weighted average basis for one calendar month. The facility must meet this limit OR, the facility must demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month.

[Permit Nos. 1150169-001-AC, 1150169-002-AC, 40 CFR 60.442(a)(1), 40 CFR 60.442(a)(2)(i), and Rule 62-204.800(8)(b)48, F.A.C.]

b. Limit emissions to less than 10 tpy HAP (e.g., Toluene); 25 TPY total combined HAPs; and 25 tpy VOC. [Permit Nos. 1150169-001-AC, 1150169-002-AC; Rules 62-4.070(3) and 62-210.200(247), F.A.C.]

8) Volatile Organic Compounds (VOC)/Organic Solvents Emissions: No person shall store, pump, handle process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emissions control devices or systems deemed necessary and ordered by SCNR. Such controls include the following:

a. Tightly cover or close all adhesive/ solvent/ coating containers when they are not in use;

b. Tightly cover all adhesive/ solvent/ coating day tanks when not in use;

c. Maintain all pipes/ valves/ fittings/ hoses in good operating condition;

d. Confine rags used with adhesives/ solvents/ coatings to tightly closed, fireproof containers when not in use; and,

e. Immediately confine and clean up any spills; make sure wastes are placed in closed containers for reuse/ recycling/ proper disposal.

[Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-296.320(1), F.A.C.]

TESTING REQUIREMENTS

9) Compliance Tests Prior to Renewal. Within 120 days prior to the expiration date of the operation permit, this emissions unit shall be tested for the following pollutants prior to obtaining a renewed operation permit: VOCs [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-297.310(7)(a)3, F.A.C.]

10) Test Requirements: The permittee shall…

a. Conduct performance tests under such conditions that are representative of performance during normal operation (90 to 100% of the maximum permitted capacity). If an emissions unit is not tested at permitted capacity, the emissions unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity [40 CFR 60.8(c), and Rule 62-297.310(2), F.A.C.]

b. Notify the SCNR in writing at least 15 days prior to any required tests with the test date, time, place, and contact person. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [40 CFR 60.8(d), and Rule 62-297.310(7)(a)9, F.A.C.]

11) Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content.
25A	Determination of total gaseous organic concentration (VOCs) using a Flame Ionizer to determine compliance with specific condition 7.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C., and Appendix A of 40 CFR 60]

(Permitting Note: Method 25A is approved by the Department as an alternate to Method 25 and is appropriate for the EU due to the effluent concentration being less than 50 ppm).

MONITORING REQUIREMENTS

12) RTO Monitoring Device: The permittee shall …

a. Install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the thermal incineration solvent destruction device's (the RTO's) exhaust gases.

b. The monitoring device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5 °C.

[40 CFR 60.445(e), Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.650, F.A.C]

RECORDS AND REPORTS

13) Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the line speed, adhesive usage rate, web size, solvent content, destruction efficiency, and RTO combustion temperature. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-297.310(8), F.A.C.]

Performance test data and results shall be submitted to the SCNR, within 45 days after the test is completed. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rules 62-297.310 and 297.401, F.A.C. [40 CFR 60.8(a), Permit Nos. 1150169-001-AC, 1150169-002-AC, Rules 62-204.800(8), 62-297.310, 62-297.310(7)(a)4a, 62-297.310(8) and 62-297.401, F.A.C.]

14) Operational Data: The permittee shall…

a. Maintain and make available for review records of the VOC and HAP content per unit of coating solids applied and compliance with the emissions limitations of Specific Condition No. 6 shall be determined by the manufacturers' formulation data. [40 CFR 60.445(a), and Permit Nos. 1150169-001-AC, 1150169-002-AC]

b. Maintain and make available for review records of the RTO chamber temperature from the monitoring equipment. [Permit Nos. 1150169-001-AC, 1150169-002-AC.]

c. Maintain and make available for review records of equipment calibration on the continuous temperature monitoring system to include the date, the name of the technician, and procedures for performing the calibration. Such records shall be kept in a maintenance log. Additionally, maintenance and repair activities on the RTO shall be documented and included in the maintenance log. [Permit Nos. 1150169-001-AC, 1150169-002-AC]

15) Emissions Calculations: When calculating emissions from the emissions unit, the permittee shall use the destruction efficiency value determined by the most recent performance test conducted on the RTO. [Permit Nos. 1150169-001-AC, 1150169-002-AC]

16) VOC Recordkeeping: The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
   a. The VOC content for each material containing or emitting VOCs;
   b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s);
   c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month; and,
   d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

   [Permit Nos. 1150169-001-AC, 1150169-002-AC]

17) HAP Recordkeeping: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
   a. The individual and total HAP contents for each material containing or emitting HAPs;
   b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s);
   c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month; and,
   d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

   [Permit Nos. 1150169-001-AC, 1150169-002-AC]

18) Abnormal Event Reports: The permittee shall promptly (by telephone during normal business hours) report any abnormal event which occurs at the facility, and within thirty (30) days of this verbal report, the permittee shall submit a written report. The written report shall include abnormal events and the corrective actions taken. [Permit Nos. 1150169-001-AC, 1150169-002-AC, and Rule 62-210.700, F.A.C.]

19) Quarterly and/ or Semiannual Reports: Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to SCNR of exceedances of the VOC emission

limits specified in Facility wide Specific condition No. 10 and EU 001 Specific Condition No. 6. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to SCNR semiannually. [40 CFR 60.447(b), and Permit Nos. 1150169-001-AC, 1150169-002-AC]

20) Records Retention: Records of the measurements/ tests/ reports required by this permit must be retained for at least three years following the date of the measurement or reporting [40 CFR 60.445(h), and Permit Nos. 1150169-001-AC, 1150169-002-AC].

OTHER REQUIREMENTS

21) Federal Requirements: This facility is subject to the requirements 40 CFR Part 60 Subpart RR, NSPS for Pressure Sensitive Tape and Label Surface Coating Operations, and 40 CFR Part 60 Subpart A, General Provisions. *SEE the following attached appendices:*

Appendix E.	40 CFR 60 Subpart RR NSPS for Pressure Sensitive Tape and Label Surface Coating Operations.
Appendix F.	40 CFR 60 Subpart A General Provisions

[Rules 62-204.800(8)(b)48 & (c), F.A.C., and 40 CFR 60 Subparts A and RR]

SARASOTA COUNTY NATURAL RESOURCES
AIR & WATER QUALITY

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