M E M O R A N D U M

DATE: April 11, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb **Thru:** Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: Final Construction Permit – 0570293-022-AC
Cory Packaging, Inc. d/b/a Master Packaging

Attached is Final Permit No. 0570293-022-AC to revise the testing condition of the 15,000 SCFM Anguil Model 150 Regenerative Thermal Oxidizer (RTO) System at Cory Packaging, Inc. d/b/a Master Packaging, a custom printed bags operation. The facility is located at 6932 South Manhattan Ave., Tampa, FL 33616.

Permit No. 0570293-021-AC required the facility to perform a destruction efficiency test for the RTO and a capture efficiency test on each press within 60 days after completion of construction of the RTO. On December 23, 2010, Cory Packaging applied for an extension of time to the construction permit and deadline for the completion of the capture efficiency testing, in order to evaluate whether to request an Alternate Sampling Procedure (ASP) from FDEP to obtain a run time less than the three hours required by Rule 62-297.450(3)(a), F.A.C., or comply with Rule 62-297.450(3)(b), F.A.C. This permit extends the expiration date of the permit to December 30, 2011 and extends the capture efficiency testing date to May 30, 2011.

The facility published the Public Notice in La Gaceta on March 25, 2011. No comments were received from the public or the facility.

Based upon our review of their request, we recommend issuance of the permit as drafted.

LAW: 0570293-022-AC

FINAL DETERMINATION

FOR

CORY PACKAGING, INC. D/B/A MASTER PACKAGING

Hillsborough County

Draft Construction Permit

Application Number

0570293-022-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 11, 2011

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on February 22, 2011 that included an Intent to Issue Air Construction Permit No. 0570293-022-AC to Cory Packaging, Inc. d/b/a Master Packaging. The facility is located at 6932 South Manhattan Ave., Tampa, FL 33616. The air construction permit extends the permit's expiration date and extends the capture efficiency testing date.

The Public Notice of Intent to Issue was published in The Tampa Tribune on March 3, 2011.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Glenn H. Goering
Chief Operating Officer
Cory Packaging, Inc. d/b/a Master Packaging
6932 South Manhattan Avenue
Tampa, FL 33616

Dear Mr. Goering:

Enclosed is Permit Number 0570293-022-AC for the construction of a two (2) bed 4.0 MMBtu/hr natural gas-fired 15,000 SCFM Anguil Model 150 Regenerative Thermal Oxidizer (RTO) System, which will control VOC emissions from the existing three (3) printing presses: Press No. 2, Press No. 5A, and Press No. 7. The Anguil RTO is to replace the existing 23,000 ACFM Pillar Technologies and Sudi-Chemie in-stack Catalytic RTO System. The new Anguil RTO is permitted to achieve a minimum VOC destruction efficiency of 90%.

Any party to this order (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 EPC in the Legal Department at 3629 Queen Palm Dr., Tampa, FL 33619; 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 Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection, Southwest District (e-mail)
Gerald J. Kissel, P.E., Southern Environmental Sciences, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

Permittee:	Permit No.: 0570293-022-AC
Cory Packaging, Inc. d/b/a Master Packaging	County: Hillsborough
6932 South Manhattan Avenue	Expiration Date: December 30, 2011
Tampa, Fl 33616	Project: Construction of Anguil Model 150 RTO

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This permit is for the construction of a two (2) bed 4.0 MMBtu/hr natural gas-fired 15,000 SCFM Anguil Model 150 Regenerative Thermal Oxidizer (RTO) System, which will control VOC emissions from the existing three (3) printing presses: Press No. 2, Press No. 5A, and Press No. 7. The Anguil RTO is to replace the existing 23,000 ACFM Pillar Technologies and Sudi-Chemie in-stack Catalytic RTO System. The new Anguil RTO is designed to achieve a minimum VOC destruction efficiency of 95% utilizing a 4.0 MMBtu/hr natural gas-fired burner. However, in order to allow the facility more operational flexibility, the minimum destruction efficiency has been lowered to 90%, which is required by Rule 62-296.515(2)(a)3., F.A.C.

Master Packaging, Inc. manufactures custom printed bags by running polyethylene film through flexographic presses, where inks are applied to meet customer specifications. Solvents are used to thin the concentrated inks. Press No. 2 is a Comexi Model 120 No. 2, Press No. 5A is a PCMC Infiniti No. 5A, and Press No. 7 is a PCMC No.7. VOC's released from the drying of the inks are captured with varying efficiencies from the presses and will be ducted to the new RTO, where the VOCs will be oxidized as they pass through two (2) alternating porcelain structured media bed each with a volume of around 590 ft^3. The RTO is capable of handling up to 200 lb/hr of VOC from the presses. Emissions are limited based on minimum capture and destruction efficiency requirements, and limits on the annual ink and solvent usage.

The facility has four bulk storage tanks that store the chemicals and solvents. The storage tanks are fixed roof tanks fitted with pressure relief valves, which help minimize VOC emissions. These tanks are considered to be insignificant emission units. The tanks store MP Blend, Recycled Solvent, Hazardous Waste Solvent and N-Propyl Acetate. MP Blend* is a Master Packaging Blend typically consisting of a mixture of N-Propyl Alcohol and N-Propyl Acetate.

The liquid waste solvent is handled by an authorized agent or processed through the solvent

recovery system (Model Resolv-r 2 ECO400 Continuous). The solvent recovery system distills the used solvent to produce clean, recycled solvent reused in the presses. The solvent recovery system is also identified as an insignificant emissions unit. Fugitive VOC emissions are released through the doors and exhaust vents on the building. These emissions are restricted by a combined limit on material usage.

Master Packaging, Inc. is currently permitted as a Title V Major Source for VOC's, but not a major source for HAP's. The facility is subject to 40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry. However, since the facility is not a major source of HAPs, it is an area source, and subject only to the recordkeeping and reporting requirements of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1) pursuant to 40 CFR 63.820(a)(3). The facility is also subject to VOC-RACT, pursuant to Rule 62-296.515, F.A.C.

Location: 6932 South Manhattan Avenue, Tampa, 33616

UTM: 17- 350.68 E 3094.38 N FACILITY ID NO: 0570293

EU ID No.: 001 – Three (3) Presses

SPECIFIC CONDITIONS:

Section I. Facility-wide.

1. General Conditions. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. Applicable Requirements. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

3. Rules of the EPC. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

4. Chapter 84-446, Laws of Florida. The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

5. 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 Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

Annual Reporting

6. The permittee shall submit to the Environmental Protection Commission of Hillsborough County, by April 1st of each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

Operation Permit Application

7. A complete application for an Operating Permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 180 days of expiration of this permit. To properly apply for an operation permit, the applicant shall submit the following:

A) The appropriate Department application form [see Rule 62-210.900, F.A.C. (Forms and Instructions)];

B) The appropriate operation permit application fee(s);

C) Copies of the records specified in Specific Condition Nos. A. 17 for the most recent three

SPECIFIC CONDITIONS:

(3) months of operation.

D) A copy of the revised Environmental Compliance plan

E) A copy of the initial compliance testing required by Specific Condition Nos. A. 13

F) A revised Compliance Assurance Monitoring Plan (CAM)

[40 CFR 64.5(a)(2); and Rules 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

Transfer of Ownership

8. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

Modifications

9. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation:

A) Alteration or replacement of any equipment or major component of such equipment;

B) Installation or addition of any equipment which is a source of air pollution;

Note: Items A and B are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit. [Rules 62-210.300 and 62-4.070(3), F.A.C.]

Modification for Permit Extension

10. The permittee may request that this permit be extended as a modification of the permit. Such a request must be submitted to the EPC in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. An extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. [Rule 62-4.080(3), F.A.C.]

11. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

SPECIFIC CONDITIONS:

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

E.U. ID No.	Brief Description
-001	Three (3) Presses: Comexi Model 120 No. 2, PCMC Infiniti No. 5A, and PCMC No.7

A.1. The maximum material usage for the three (3) flexographic printing presses in any 12 consecutive month period is limited as follows:

Material	Usage (lbs.)
Inks	900,000
Solvents	700,000

[Construction Permit Application received February 9, 2010, Rules 62-4.070(3) and 62-4.160(2), F.A.C.]

A.2. The facility is allowed to operate continuously, i.e., 8760 hours per year.
[Construction Permit Application received Permit Application received February 9, 2010, Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions - (PTE)]

Emission Limitations and Standards

A.3. The maximum Volatile Organic Compound (VOC) potential to emit from the presses shall not exceed 153.9 tons for any consecutive twelve month period. The maximum hazardous air pollutant (HAP) emissions shall not equal or exceed 10 tons for any individual HAP or 25 tons for the cumulative total of all HAPs. The VOC and the HAP emission limits are to be verified by the recordkeeping requirements of Specific Condition No. A.17 and by the testing requirements of Specific Condition Nos. A.8, A.9 and A.13.
[Construction Permit Application received February 9, 2010, Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions - (PTE)]

A.4. The permittee shall install, calibrate and maintain a continuous temperature monitoring system to measure and record the media bed temperatures in the RTO. [Rule 62-4.070(3), F.A.C.]

A.5. The presses shall be operated only when the RTO is in operation and operating according to the manufacturer's guidelines except during the startup and shutdown period or in case of the malfunction of any emission unit and when the excess emissions are allowed to occur under the provisions described below in Rule 62-210.700, F.A.C.:

1) The excess emissions resulting from startup, shutdown, or malfunction of any emissions unit shall be permitted providing:
   i) Best operational practices to minimize emissions are adhered to, and

SPECIFIC CONDITIONS:

ii) The duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the EPC for longer duration.

2) The excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. Poor operation includes failure to immediately shut down all operating presses once excess emissions from a malfunction are realized.

3) In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Management Division of the EPC of Hillsborough County in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted within 7 days of the occurrence of the excess emissions. This notice must contain a description of the malfunction, any steps taken to mitigate emissions and corrective actions taken.

[Rules 62-210.700 and 62.4.070(3), F.A.C.]

A.6. The following restrictions and limitations shall apply in order to ensure compliance with the VOC Potential to Emit of Specific Condition No. A.3:

1) The minimum capture efficiency for VOC emissions generated during the printing operation for the following presses shall be:

Press No.	Name	Width	Capture Efficiency
5A	PCMC Infiniti N0. 5A	57”	85%
2	Comexi Model 120 No. 2	50”	65%
7	PCMC No. 7	55”	65%

2) The RTO System shall be operational at all times during any press operation, and shall oxidize at least 90 percent of the Volatile Organic Compounds (VOC measured as total combustible carbon using EPA Method 25 or as propane using EPA 25A).
3) The combustion media bed temperature must be maintained at or above 1,500° F or at the temperature established during the initial compliance test required by Specific Condition Nos. A.7, A.8, A.9, and A.10.
4) The RTO shall be fired exclusively on natural gas at a maximum heat input of 4.0 MMBtu/hr.
5) The maximum consecutive 12-month product usage for the combined operation of Press No. 2 and No. 7 shall not exceed 450,000 lb/yr of inks or 350,000 lb/yr of solvents.
6) The VOC loading rate from the three (3) presses to the RTO inlet shall not exceed 200 lb/hr at any time.

SPECIFIC CONDITIONS:

7) Maximum inflow to the incinerator shall not exceed 15,000 SCFM.
8) All the pick-up hoods on the presses shall be maintained under a negative pressure during operation.
9) The liquid waste from the printing operation shall be directed to a closed container and properly disposed/recycled off-site. Where practical, recycling of ink/solvent mixtures is permitted on-site and may be included as a reduction in calculated emissions as defined by VOC_{net} in Specific Condition A.17.

[Rules 62-296.515(2)(a)3., 62-296.320(1), and 62-4.070(3), F.A.C.]

Test Methods and Procedures

A.7. The permittee shall demonstrate compliance with the minimum destruction efficiency requirement for the RTO, as identified in Specific Condition No. A.6.2). The destruction efficiency test for the RTO shall be performed no later than 60 days after completion of construction of the RTO. The destruction efficiency test shall be consistent with the requirements of Specific Condition Nos. A.8, A.12, and A.13. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County office within 45 days of such testing.
[Rules 62-4.070(3) and 62-297.310, F.A.C.]

A.8. In order to demonstrate compliance with the capture efficiency requirements of Specific Condition No. A.6, the permittee shall conduct testing on each press in accordance with Specific Condition No. A. 13 by May 30, 2011.
[Rules 62-4.070(3) and 62-297.310, F.A.C.]

A.9. Compliance with the destruction efficiency requirement and with the emission limitations of Specific Condition Nos. A.3 and A.6 shall be demonstrated by EPA Methods 1, 2, 24, 24A or EPA 450/3-84-019 and EPA Method 25 or Attachment 3 of EPA 450/2-78-041*, contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297.401, F.A.C. Determine the VOC concentration of the waste solvent using EPA Method 24 or 25D. Failure to submit the ink(s) and solvent(s) consumption rates, input rates, RTO media bed temperatures, and actual operating conditions may invalidate the test. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297.310, F.A.C. [Rules 62-296.515(3)(b), 62-297.440(7), and 62-4.070(3), F.A.C.]

* [Permitting Note: Attachment 3 of EPA 450/2-78-041 allows the use of EPA Method 25A in lieu of EPA Method 25 when the resultant or anticipated VOC exhaust concentration is 50 ppm or less measured as carbon.]

A.10. Compliance tests required for destruction efficiency for the RTO and capture efficiency for each press shall be conducted with the system operating at capacity. Capacity is defined as the processing of printing material across the presses at a rate minimally equivalent to the normal processing rate experienced by each press, <u>and</u> all of the presses in operation. If it is impractical to operate all the presses with active printing jobs during the required test, then all of the ventilation systems from the remaining presses should

SPECIFIC CONDITIONS:

also be in operation. The ink and solvent consumption rates shall be recorded on the press being tested and averaged for the testing period. The permittee must include documentation with the test based on comparisons with the operating history that shows that the processing rate during the test was indicative of at least "normal" loading. The operating conditions of all the presses, along with the media bed temperatures monitored during the test required by Specific Condition No. A.4., shall be included in the test report. Capacity for the destruction and capture efficiency test is defined as all of the presses in operation and 90-100% of the maximum incinerator loading rate for VOC's of 200 lbs/hr. If tested at capacity, then the ink and solvent average hourly usage rates during the test shall become the operating limit for the facility until another compliance test is performed.

If it is impracticable to test at capacity, then the presses may be tested at less than capacity; in this case, subsequent operation is limited to 110 % of the ink and solvent consumption rates per hour during the test until a new test is conducted. In addition, the facility shall be limited to operate only as many presses simultaneously as were in operation during the test. The limit on the number of presses permitted to operate at the same time following the test can be met, but not exceeded, by any combination of presses.

Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. The permittee shall submit a statement of the operating mode as part of the compliance test. Failure to submit an operation mode statement or operating at conditions which do not minimally reflect the normal operating conditions may invalidate the data.

[Section 403.161(1)(c) Florida Statutes and Rule 62-4.070(3), F.A.C.]

A.11. Compliance with the limitations of Specific Condition No. A.3 shall be determined, in part, using EPA Methods 24 or 24A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297.401, F.A.C., or a certification by the ink/solvent manufacturer of the composition of the coating if it is supported by actual batch formulation records and the recordkeeping as required in Specific Condition No. A.17. [Rules 62-297.401, F.A.C.]

A.12. The EPA VOC DATA SHEET, Properties of the Coating "AS SUPPLIED" by the manufacturer (EPA Document 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings) or equivalent shall be kept-on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County. If any VOC solvents are added to the material once the manufacturer has packaged it, then the "AS APPLIED" VOC DATA SHEETS shall be used. [Rule 62-4.070(3), F.A.C.]

A.13. All emissions tests performed pursuant to the requirements of the Rule 62-296.515, F.A.C. shall comply with the following requirement:

1) Destructive. The test method for Volatile Organic Compounds shall be EPA Method 25 or Attachment 3 of EPA 450/2-78-041, with equipment specifications per Industrial Ventilation

SPECIFIC CONDITIONS:

Manual, incorporated and adopted by reference in Rule 62-297, F.A.C. EPA Method 25A shall be allowed, when the use of EPA Method 25A is consistent with EPA and DEP guidance.

2) Nondestructive. The test method for volatile organic compounds shall be EPA VOC Capture Efficiency Test Procedures Rule 62-297.440(7), F.A.C. The sampling time for each capture efficiency test run shall be as follows as approved by the Department pursuant to Rule 62-297.620, F.A.C.:
   i) Capture efficiency tests which use a total temporary enclosure or building enclosure with one of the liquid/gas or gas/gas methods identified in Rules 297.450(2)(a) through (d), F.A.C., shall consist of at least three sampling runs. Each run shall cover at least one complete production cycle, but shall be at least 3 hours long. The sampling time for each run need not exceed 8 hours, even if the production cycle has not been completed.
   ii) Capture efficiency tests which use the traditional liquid/gas method identified in Rule 297.450(2)(e),F.A.C., shall consist of the total number of runs needed to comply with either the data quality objective criteria or lower confidence limit criteria of Section 3.0 of EPA Emission Measurement Technical Information Center Guideline Document GD-035, "Guidelines for Determining Capture Efficiency," January 9, 1995, adopted by reference at Rule 62-297.440, F.A.C. However, each traditional liquid/gas capture efficiency test shall consist of at least 3 sampling runs. The sampling time for each run shall be neither less than 20 minutes nor more than 24 hours. All runs with a capture efficiency result of more than 105 percent shall be deemed invalid and discarded. Traditional liquid/gas capture efficiency tests shall comply with all other provisions of section 3.0 of Guideline Document GD-035.

[Rules 62-296.515 and 62-297.450(3), F.A.C.; ASP No. 99-C-01]

A.14. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 days prior to (unless specified otherwise) the date on which each formal compliance test is to begin, of the date, time and place of each such test and the contact person who will be responsible for coordinating and having such test conducted.
[Rule 62-297.310(7)(a)9., F.A.C.]

Standards for Work and Operational Practices

A.15. Operation and Maintenance Plan: The permittee shall operate and maintain the RTO according to the incinerator manufacturer's "Environmental Compliance Plan" dated February 3, 2010, or any subsequent revision approved by the EPC.
[Environmental Compliance Plan revised February 3, 2010 as part of Construction Permit Application received February 9, 2010, and Rule 62-4.070(3), F.A.C.]

A.16. 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

SPECIFIC CONDITIONS:

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

Recordkeeping Requirements

A.17. Compliance with emission limitations/restrictions of Specific Condition Nos. A.1, A.2., A.3, and A.6 shall be demonstrated by use of records. The records shall be retained at least for the most recent five year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, the Department, or federal air pollution agency upon request. The records shall include, but are not limited to, the following:

VOC RACT (Daily Records)

1. Day, month, year,
2. Application method and substrate type,
3. Amount of inks and cutting solvents used in pounds per press,
4. Amount of clean up solvent used in total pounds per press,
5. Operating log indicating the time periods (hours) that each press was in operation,
6. The VOC content of each solvent and ink (lb/gal), and
7. The temperature of each of the two (2) media beds

Facility Limitations (Monthly and Twelve Month Rolling Total Records)

1. Each press(es) run time in hours as read from the elapsed time meters,
2. Twelve month rolling total of press run time for each of the three (3) presses,
3. Amount of inks and cutting solvents used in pounds per press,
4. Amount of cleanup solvent used in total pounds per press,
5. Total VOCs and HAPs of all inks and cutting solvents used for the month in pounds per press,
6. Total VOCs and HAPs of cleanup solvent used in total pounds,
7. Total liquid waste recovered in pounds from all presses,
8. VOC content of liquid waste recovered as determined by EPA Method 24 or 25D analysis on a monthly basis,
9. NET VOC and HAP emissions as calculated below:

VOC_{net} = Total VOC content of clean up solvents in pounds
+ Sum Total (of all 3 presses) of VOC contribution from each press (VOC content of all inks and cutting solvents in pounds per press x [(1-CE) + CE(1-DE)] for that press)
- VOC content of liquid waste recovered in pounds

HAP_{net} = Sum of total HAPs used (i.e. no credit for incineration or liquid waste recovery)

where:
minimum CE (capture efficiency) for each press is listed in Specific Condition A.6.1) and the DE is 95%.

SPECIFIC CONDITIONS:

10. Twelve month rolling total of net VOC emissions from this emission unit in tons per year.
11. Twelve month rolling total of average ink and solvent usage in lb/yr per press and combined.

[40 CFR 63.829(d), Rules 62-296.500(2)(b) and 62-4.070(3), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director