M E M O R A N D U M

DATE: September 23, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Jeff Sims **THRU:** Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: DRAFT/PROPOSED Permit No. 0570293-023-AV
Star Packaging Corporation, Tampa, Florida
Title V Air Operation Permit Renewal

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- DRAFT/PROPOSED permit; and,
- P.E. Certification.

The DRAFT/PROPOSED permit renews the Title V permit for Star Packaging Corporation (formerly known as Cory Packaging, Inc.), which is located in Hillsborough County, Florida. The permit incorporates Permit No. 0570293-022-AC, documents the removal of Press No. 7 as an active press, and also formally recognizes a name change of the permittee from Cory Packaging, Inc. to Star Packaging Corporation. The Statement of Basis provides a summary of the project and the rationale for issuance. Changes to the Title V permit made during this renewal are also summarized in the attached Statement of Basis. The P.E. certification briefly summarizes the proposed project.

The application was received and deemed complete on June 30, 2011. Day 90 is September 28, 2011. There is no ongoing/open enforcement case for this facility.

Star Packaging Corporation manufactures custom printed bags by running polyethylene film through flexographic presses, where inks are applied to meet customer specifications. Solvents are used for general cleaning purposes and to thin the concentrated inks. There are two presses currently at the facility: Press No. 2 (Comexi Model 120) and Press No. 5A (PCMC Infiniti). Press No. 7 was removed from service and is scheduled to be removed from the facility. VOC's released from the drying of the inks are captured with varying efficiencies from the presses and ducted to the new Regenerative Thermal Oxidizer (RTO), where the VOCs are 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. The

RTO is required to meet a minimum VOC destruction efficiency of 90%, consistent with the requirements from Rule 62-296.515(2)(a)3., F.A.C. 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 facility also includes a lamination line that does not use solvents, and a solvent recovery (distillation) system which are also identified as insignificant emission units.

I recommend your approval of the attached DRAFT/PROPOSED permit.

Attachments