Star Packaging Corporation
Tampa, Florida

Facility ID No. 0570293
Hillsborough County

REVISED DRAFT/PROPOSED Title V Air Operation Permit Renewal

Permit No. 0570293-023-AV
(Renewal of Title V Air Operation Permit No. 0570293-013-AV)

Permitting and Compliance Authority:

Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: (813) 627-2600
Fax: (813) 627-2660

Title V Air Operation Permit Renewal

Permit No. 0570293-023-AV

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PERMITTEE:
Star Packaging Corporation
6932 South Manhattan Avenue
Tampa, FL 33616

REVISED DRAFT/PROPOSED Permit No. 0570293-023-AV
Tampa, Florida
Facility Id No. 0570293
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. This project also incorporates Permit No. 0570293-022-AC, documents the removal of Press #7 as an active press, includes the addition of an alternative sampling plan (ASP) for capture efficiency testing, and formally recognizes a name change of the permittee from Cory Packaging, Inc. to Star Packaging Corporation. The flexographic printing facility is located in Hillsborough County at 6932 South Manhattan Avenue, Tampa, Florida. UTM Coordinates are: Zone 17, 350.7 km East and 3094.4 km North. Latitude: 27° 57' 58" North and Longitude: 82° 31' 05" West.

The 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. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE of FINAL PERMIT, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(DRAFT/PROPOSED)

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Richard D. Garrity
Executive Director

RDG/JDS/jds

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

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 prior to application onto the film. The film, in long rolls, is fed through the press. After ink is applied at the first color applicator, hot air is blown onto the wet ink to evaporate the solvent. The coated film then proceeds further in the press for additional ink (different colors) application as necessary. After all the colors have been applied, the film is cut into desired sizes and packaged for shipment.

There are two flexographic presses in operation at the facility: Press No. 2 (Comexi Model 120 - 50" wide) and Press No. 5A (PCMC Infiniti – 57" wide). Press No. 7 was removed from service and is scheduled to be removed from the facility. Volatile organic compounds (VOCs) released from the inks at the individual press dryers are captured with varying efficiencies from the presses and ducted to a common plenum on the roof. In order to reduce VOC emissions, minimum capture efficiencies are required by each press. The collected vapors are then directed to the Regenerative Thermal Oxidizer (RTO), where they are progressively heated in a porcelain media bed as they move toward the combustion chamber. The VOCs are oxidized in the combustion chamber and the exhaust then passes across a second media bed which results in a significant increase in bed temperature and decrease in exhaust temperature. The gases are then exhausted through a vertical stack. Valves are used to alternate the inlet and outlet airflow across the two beds in order to maximize the thermal recovery and overall efficiency of the unit. Each porcelain structured media bed has a volume of around 590 ft^3. The control unit is a 4.0 MMBtu/hr natural gas-fired 15,000 SCFM Anguil Model 150 RTO System 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. CAM does apply to this printing operation.

The facility has four bulk storage tanks that store the chemicals and solvents. The tanks range between 2,000 to 8,000 gallons. 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 typically 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.

Also included in this permit are other miscellaneous unregulated/insignificant emissions units and/or activities, including the laminator machines and the Press No.2 process dryers.

The facility is subject to 40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry; however, since it is not a major source of HAPs, there are only recordkeeping requirements from this Subpart (refer to 40 CFR 63.820(a)(3)). The facility is also subject to VOC-RACT (Rule 62-296.515, F.A.C.).

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Two Flexographic Printing Presses: No. 2 - Comexi Model 120, and No. 5A - PCMC Infiniti

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received June 30, 2011, this facility is NOT a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart KK	001
Rule 62-296.515, F.A.C.	001

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.; and Chapter 1-3.22, Rules of the EPC]

FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department or its delegated agent, the Environmental Protection Commission of Hillsborough County, including the following:

1) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
2) Prevent excessive air turbulence across exposed areas where VOCs are released.
3) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
4) All fittings, valves, valve lines, ducting, etc. shall be properly maintained.
5) Immediately attend to all spills/waste as appropriate.
6) Liquid waste shall be collected and stored in closed containers. It shall be hauled away by a licensed agent.
7) Recycling of ink/solvent mixtures are encouraged as long as appropriate collection practices are followed.
8) Keep all doors, vents, etc. on the exterior of the building closed, as much as possible.
9) Operate the solvent recovery system according to manufacturer's guidelines and keep all tanks and storage/collection areas on the unit closed unless actively accessing for maintenance.

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

FW4. General Visible Emissions. 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 equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. 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.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. 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]

Additional Conditions

FW10. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which defines day one. [Rule 62-213.440(1), F.A.C.]

FW11. The HAP, as defined in Rule 62-213.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, or less than 25 tons in any 12 consecutive month period for any combination of HAPs. [Rule 62-210.300(2)(b), F.A.C.]

FW12. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 9, EPA Method 24, or other approved methods, as deemed necessary. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

FW13. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited. [Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

FW14. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to 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 an having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

FW15. 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: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

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.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

FW16. 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.]

FW17. Any reports, data, notifications, certifications, and requests required to be sent to the Environmental Protection Commission of Hillsborough County shall be sent to:

Environmental Protection Commission of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619

FW18. 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 and Toxics 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

FW19. 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.]

FW20. A minimum of two copies of an operating permit application for a Title V Operating Permit Renewal shall be submitted to the EPC at least 225 days prior to the expiration date of this permit. [Rules 62-213.420(1)(a), F.A.C.]

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
001	Two Flexographic Printing Presses: No. 2 - Comexi Model 120, and No. 5A - PCMC Infiniti

Custom printed bags are manufactured 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 prior to application onto the film. The film, in long rolls, is fed through the press. After ink is applied at the first color applicator, hot air is blown onto the wet ink to evaporate the solvent. The coated film then proceeds further in the press for additional ink (different colors) application as necessary. After all the colors have been applied, the film is cut into desired sizes and packaged for shipment.

There are two flexographic presses in operation at the facility: Press No. 2 (Comexi Model 120 - 50" wide) and Press No. 5A (PCMC Infiniti – 57" wide). Press No. 7 was removed from service and is scheduled to be removed from the facility. Volatile organic compounds (VOCs) released from the inks at the individual press dryers are captured with varying efficiencies from the presses and ducted to a common plenum on the roof. In order to reduce VOC emissions, minimum capture efficiencies are required by each press. The collected vapors are then directed to the Regenerative Thermal Oxidizer (RTO), where they are progressively heated in a porcelain media bed as they move toward the combustion chamber. The VOCs are oxidized in the combustion chamber and the exhaust then passes across a second media bed which results in a significant increase in bed temperature and decrease in exhaust temperature. The gases are then exhausted through a vertical stack. Valves are used to alternate the inlet and outlet airflow across the two beds in order to maximize the thermal recovery and overall efficiency of the unit. Each porcelain structured media bed has a volume of around 590 ft^3. The control unit is a 4.0 MMBtu/hr natural gas-fired 15,000 SCFM Anguil Model 150 RTO System 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. CAM does apply to this printing operation.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum combined material usage for the two (2) flexographic printing presses in any 12 consecutive month period is limited as follows:

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

[Rules 62-4.070(3), 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and Permit No. 0570293-022-AC]

A.2. Hours of Operation. This emission unit may operate continuously (8,760 hours/year). [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Permit No. 0570293-022-AC]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

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.20 and by the testing requirements of Specific Condition No. A.11. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Permit No. 0570293-022-AC]

Continuous Monitoring Requirements

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.; and Permit No. 0570293-022-AC]

Operating Requirements

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 periods or in case of the malfunction of any emission unit and when the excess emissions are allowed to occur under the provisions described in Rule 62-210.700, F.A.C. [Rules 62-4.070(3) and 62-210.700, 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
2	Comexi Model 120	50"	65%
5A	PCMC Infiniti	57"	85%

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 of the RTO must be maintained at or above 1,500° F based on initial compliance testing. Operation at lower temperatures may only occur following new destruction efficiency compliance tests demonstrating compliance at lower temperatures.
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 operation of Press No. 2 shall not exceed 450,000 lb/yr of inks or 350,000 lb/yr of solvents.
6) The VOC loading rate from the two (2) presses to the RTO inlet shall not exceed 200 lb/hr at any time.
7) Maximum inflow to the RTO 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 No. A.20.

[Rules 62-296.515(2)(a)3., 62-296.320(1), and 62-4.070(3), F.A.C.; and Permit Nos. 0570293-017-AC and -022-AC]

Excess Emissions

A.7. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. [Rule 62-210.700(1), F.A.C.]

A.8. Excess Emissions Prohibited. 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. [Rules 62-4.070(3) and 62-210.700(4), F.A.C.]

A.9. 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 62-4.070(3) and 62-210.700(6), F.A.C.; and Permit No. 0570293-012-AC]

Monitoring of Operations

A.10. CAM Plan. This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Test Methods and Procedures

{**Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.11. Compliance Tests Prior To Renewal. The permittee shall perform a Destruction Efficiency test of the presses/RTO and a Capture Efficiency test of each press at least once every 5 years prior to permit renewal. The tests shall occur at least 60 days prior to the renewal application due date (225 days prior to the permit expiration date) in order to demonstrate compliance with the emission limits in Specific Conditions A.6**.** A written testing protocol shall be submitted by the permittee to the Commission at least 30 (thirty) days prior to the scheduled destruction and capture efficiency test dates. The frequency of testing for destruction efficiency will be re-evaluated at permit renewal based on the operation and performance of the RTO. Two copies of the test data shall be submitted to the Air Management Division of the EPC within 45 days of such testing. [Rules 62-4.070(3), 62-210.300(2)(a) and 62-297.310(7) and (8), F.A.C.; and Permit No. 0570293-022-AC]

A.12. Test Methods and Conditions. Compliance with the destruction and capture efficiency requirements and with the emission limitations of Specific Condition Nos. A.3 and A.6 shall be demonstrated by EPA Methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
24	Volatile Matter, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
24A or EPA 450/3-84-019	Volatile Matter and Density of Publication Rotogravure Inks and Related Publication Rotogravure Coatings
25 or Attachment 3 of EPA 450/2-78-041*	Total Gaseous Nonmethane Organic Emissions as Carbon
204 (A-F as needed)**	Criteria for and Verification of a Permanent or Temporary Total Enclosure

The above methods are described and contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Determine the VOC concentration of the waste solvent using EPA Method 24 or 25D. The capture efficiency for each press shall be determined by using the methodology described in Specific Condition A.17. Destruction efficiency tests shall be conducted simultaneously on the oxidizer inlet and outlet for VOC. For the capture efficiency test, each of the composite ink/solvent mixtures shall be evaluated as it is applied to the ink applicator after diluting. 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), 62-297.401, 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.]

** [Permitting Note: Alternative Sampling Procedure (ASP) No. 11-E-AP, as attached to this permit, allows reduced frequency times for capture efficiency testing runs as long as the ASP requirements are met, as referenced in Specific Condition No. A.17.

A.13. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.14. 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, and 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 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 records of damper position settings during the test and 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; Rules 62-4.070(3) and 62-297.310, F.A.C.; and Permit Nos. 0570293-012-AC and -022-AC]

A.15. 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.20. [Rules 62-297.401, F.A.C.]

A.16. 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.17. All emissions tests performed pursuant to the requirements of the Rule 62-296.515, F.A.C. shall comply with the following requirements:

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 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.

   However, in accordance with Alternate Sampling Procedure (ASP) No. 11-E-AP which has been approved and attached to this permit, the sampling runs can be reduced to a minimum of 1 hour for Press 5A and Press 2 capture efficiency tests which use total temporary enclosure or building enclosure with the gas/gas method identified in Rules 62-297.450(2)(a) – (d), F.A.C. As stated in the attached Testing Protocol Approval from FDEP, due to the condensed sample time of such runs, three velocity measurements are required each hour at each sampling site during testing rather than only one as specified in Methods 204B and 504E. In addition, as stated in the Testing Protocol Approval, a minimum of two wall fans must be in operation near each press during testing in order to capture the VOC's for data analysis most effectively and to maintain sufficient flow rates at the presses.

   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. 11-E-AP]

Standard for Work and Operational Practice

A.18. Operation and Maintenance Plan. The permittee shall operate and maintain the RTO according to the oxidizer manufacturer's "Environmental Compliance Plan" dated June 24, 2011, or any subsequent revision approved by the EPC. [Rule 62-4.070(3), F.A.C.; and Permit Nos. 0570293-003-AC, -008-AC and -022-AC]

A.19. The permittee shall promptly (by telephone or e-mail 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. [Rule 62-4.070(3), F.A.C.; and Permit Nos. 0570293-003-AC and -008-AC]

Recordkeeping, Reporting and NESHAP Requirements

A.20. In order to ensure compliance with the emission limitations/restrictions of Specific Condition Nos. A.1, A.2., A.3, and A.6, the permittee shall maintain daily/monthly/annual records of operations for the most recent 5-year period. The records shall be made available to the EPC, state 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 and HAP 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 run time in hours as read from the elapsed time meters,
2. Twelve month rolling total of press run time for each of the two (2) 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 both 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; however, the permittee may have the option of taking credit for incineration and/or liquid waste recovery if desired at a future time, but only if the methodology for determining the HAP reductions has been approved by the EPC)

where:
CE (capture efficiency) for each press and DE (destruction efficiency) for the RTO are based on the most recent compliance tests

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, and
12. Monthly and twelve month rolling total of natural gas used by the facility in million cubic feet.

[40 CFR 63.829(d); Rules 62-4.070(3), 62-213.440(1)(b), and 62-296.500(2)(b), F.A.C.; and Permit Nos. 0570293-003-AC, -008-AC, and -012-AC]

A.21. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Appendix A, Glossary.
Appendix Alternative Sampling Plan No. 11-E-AP
Appendix CAM, Compliance Assurance Monitoring Plan.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart Dc.
Appendix O&M (Environmental Compliance) Plan
Appendix O&M – RTO Spare Parts List
Appendix RR, Facility-wide Reporting Requirements.
Appendix SS-1, Stack Sampling Facilities
Appendix Testing Protocol Approval
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.