M E M O R A N D U M

DATE: October 13, 2011

TO: Richard D. Garrity, Ph.D.

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

SUBJECT: REVISED 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;
- REVISED 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 was September 28, 2011. There is no ongoing/open enforcement case for this facility.

The DRAFT/PROPOSED permit was issued on September 26, 2011. However, comments were received via e-mail from the permittee on September 30, 2011 and October 5, 2011. The comments have resulted in the addition to the permit of a reference to the alternative sampling procedure (ASP) approved by the DEP (DEP File No.: 11-E-AP) on May 13, 2011 in regard to capture efficiency testing. There was also a minor addition of an updated RTO spare parts list to the O&M Plan. The addition of the ASP to the permit was deemed significant enough to require issuance of a REVISED permit.

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 REVISED DRAFT/PROPOSED permit.

Attachments