ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Kerry Temoin
Plant Manager
Evergreen Packaging
2104 Henderson Way
Plant City, FL 33563
_____/

File No.: 0570417-017-AF
County: Hillsborough

Enclosed is renewal Permit Number 0570417-017-AF to operate a beverage packaging manufacturing facility located at 2104 Henderson Way in Plant City, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice.

A 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 within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only

at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(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 the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

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

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC'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 the EPC on the application 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, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

CERTIFICATE OF SERVICE

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

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

_____ _____

Clerk Date

PERMITTEE:
Evergreen Packaging Plant City Facility
2104 Henderson Way
Plant City, FL 33563

PERMIT/CERTIFICATION
Permit No: 0570417-017-AF
County: Hillsborough
Expiration Date: 08/22/2019
Project: Beverage Package Manufacturing

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 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 of hereof and specifically described as follows:

This permit authorizes the operation of a beverage packaging manufacturing facility. The operation consists of web offset presses, abhesive stations, a rotary scoring head that creases the paper for folding, a rotary die cutting head cuts the cartons from the paper, and natural gas fired sealers. The following is a detailed description of this process.

The facility manufactures paper cartons for liquid packaging for human consumption. Polyethylene coated roll stock is purchased and transported to the facility by truck or rail. The rolls are run through a series of five (5) press lines that sequentially apply six (6) colors of ink, using offset lithography printing, and also apply varnish (varnish is stored in a 700 gallon tank) to the paper, using wide-web flexography. Varnish is applied over the ink to stop "ink scuffing" and to control coefficient of friction (COF). Once the ink and varnish are applied, the paper is dried inside an electron beam dryer (EB Dryer). As the printed paper moves through the EB Dryer the ink on the paper absorbs electrons generated by a filament that is heated by electricity within the EB Dryer causing the ink to cure (dry). X-ray radiation is generated whenever the electrons are stopped or absorbed in matter (paper & ink). However, the EB Dryers are designed so that they have shielding all around except for the entrance and the exit points. The entrance and exit points are designed in such a way that x-ray radiation and electron leakage are reduced to safe levels. After the dryer, the continuous web of paper then feeds to the abhesive station, where abhesive solution is applied by rotogravure printing to a portion of the paper to facilitate the opening of the finished carton by the consumer. However, if the carton has a screw top, no abhesive is applied.

Once the continuous web of paper is printed and dried, it is converted into flat cartons. A rotary scoring head creases the paper for folding and a rotary die cutting head cuts the carton from the paper and cuts the hole in the carton if the carton has a screw cap type opening. The flat cartons, called blanks, are moved on a series of belts to an automatic stacking section (all of which are automatic stacking (Presses No. 1, 3, 4 and 5) with the exception of Press No. 2 which is a manual stacker). These stacks are then

removed from the press lines and placed onto metal pallets. The cartons are checked for printing quality and carton integrity throughout the entire process.

After the commercial product has been placed on pallets it is transported to the sealing department. There are six (6) sealers, all of which are automatically fed (Sealer Nos. 1, 3, 4, 5 and 6), for the exception of Sealer No. 2, which is manually fed. A fork lift delivers the cartons to the sealer. The cartons are fed through a series of belts, folding the scores and skived, where a 5/8 inch edge of the paper is folded over so that when the finished carton is filled with product, the liquid product does not contact the paper that has not been treated with the polyethylene. Any paper in excess of 5/8" is trimmed off. Then they are fed through the burner section (flame treaters) of the sealer where the side seam (seal) is heated by a natural gas fired sealer activating the polyethylene, and then fed through the final fold section, where the seal is ironed (sealers). In the sealing process, the edges of the carton stick together forming a water proof seal at the side seam of the carton. Once side seamed, the cartons are single fed into an auto-packer where they are counted and packed in cases. Each case is printed with an ink jet printer to include the date and time of production and the name of the operator and product. The case conveyed to a palletizer where they are automatically placed onto pallets. A full pallet is ejected onto a conveyor and carried to an auto stretch wrapper in the warehouse.

Detailed Emission Source Description

Press Lines 1, 2, 4 and 5

Each press line has a Komori-Chambon 28" E-beam web offset lithographic presses and an EB dryer. The presses and *(non- fuel combustion)* EB dryers are used to perform offset lithography continuous web printing using low-VOC inks and solutions (electron-beam inks, electron-beam coatings, ink reducers and fountain solutions). The EB dryers are manufactured by RPC except for the EB dryer on Print Line No. 5, which is manufactured by ESI.

Press Line 3

Press Line 3 is equipped with one (1) Komori-Chambon 40-inch electron beam web offset lithographic press and dryer manufactured by Energy Science, Inc., The press and *(non- fuel combustion)* EB dryer are used to perform offset lithography continuous web printing using low-VOC inks and solutions (electron-beam inks, electron-beam coatings, ink reducers and fountain solutions).

Four (4) Komori-Chambon abhesive (rotogravure) stations where abhesive material (to prevent sealing) is applied using rotogravure printing to sections of the carton to facilitate the opening of the carton by the consumer. Primarily water-based abhesive solution is used, but solvent-based abhesive solution is also used when required.

Six (6) glue stations used to close and seal the packaging cartons. The glue used contains a small percentage of VOCs. Glue Stations 1 & 2 are manufactured by Nordson and Glue Stations 3, 4, 5 and 6 are manufactured by Valco.

Six (6) Marsh ink jet units located at the delivery end of the sealers are used to print customer and manufacturing codes on both sides of the cardboard shipping boxes which contain the finished cartons. The ink jet stations are the last step before palletizing. The inks used contain small percentages of VOCs and HAPs.

Volatile Organic Compounds (VOCs) and hazardous air pollutants (HAPs) are emitted during the flexographic, rotogravure printing operations, sealing and the packaging operation. The facility also uses various cleaners, quality control chemicals and miscellaneous solvents throughout the process. The VOC emissions from the presses are controlled through the use of "low solvent content coating technology" electron-beam inks and coatings, and restrictions on the utilization rates and VOC contents of the inks and coatings. VOC emissions from the glue stations, inkjet stations, and cleaning solutions are controlled by restrictions on the utilization rates and/or VOC contents.

The flexographic and rotogravure printing operations at this facility are subject to the NESHAP area source requirements (recordkeeping and reporting) of 40 CFR 63, Subpart KK (Printing and Publishing Industry). The facility is also subject to Rule 62-296.503, F.A.C. - Paper Coating (Rotogravure coaters).

On site there are the several categorically exempt sources. The six (6) natural gas fired paper sealers, each with 1.5 or 1.6 MMBtu/hour heat input, are exempt from permitting under Rule 62-210-300(3)(a)33, F.A.C., since the total heat input capacity for all sealers is less than 10 MMBtu/hr. The emergency generator is exempt under 62-210-300(3)(a)35, F.A.C., since it uses less than 4.4 $MM(ft)^3$/yr of natural gas per year. On site there are propane fired clamp trucks and fork lifts, which are exempt from permitting since they use less than 144,000 gallons/year of propane, pursuant to Rule 62-210.300(3)36, F.A.C.

Also, there are several sources that are generically exempt from permitting under Rule 62-210-300(3)(b), F.A.C. These include; four (4) cooling towers with water treatment systems (chemical usage); plate making operations; three (3) skive 2,670 CFM dust collectors that vent indoors (with cyclone located prior to baghouse) and two (2) Trim Bailers with 4,320 CFM cartridge filters that vent indoors, and a 700 gallon tank that store varnish.

Location: 2104 Henderson Way, Plant City, FL 33563

UTM: 17-391.7 E 3099.3 N

NEDS NO: 1151

Emission Unit ID: 012 - Beverage Packaging Manufacturing Operations

Replaces Permit No.: 05700417-016-AF

References Permit No. 05700417-013-AC

SPECIFIC CONDITIONS:

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

2. 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.]

3. 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.]

4. All of the emissions sources/activities at this facility are permitted for continuous operation (i.e., 8,760 hours/year). [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE); Permit No. 0570417-013-AC]

5. As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for both Volatile Organic Compound (VOCs) and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-4.070(1), F.A.C. and Permit No. 0570417-013-AC]

A) VOC emissions from the facility shall not exceed 94.5 tons per any 12 consecutive month period.
B) 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, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.

6. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C. and Chapter 1-3.22(3), Rules of the EPC]

7. Visible emission (VE) from beverage packaging operation shall not exceed 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C. and Chapter 1-3.25(1), Rules of the EPC]

8. No person shall store, pump, handle, process, load, unload or use in any process or installation organic solvents that contain VOC without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPC. [Rule 62-296.320(1), F.A.C.]

9. Usage rates and maximum annual average VOC contents for the following materials used in the beverage packaging manufacturing operation shall not exceed the following:
[Rules 62-4.070(3) and 62-296.503, F.A.C., and Permit Nos. 0570417-013/016-AC/AF]

SPECIFIC CONDITIONS:

Process Chemical Group	**Materials**	**Annual Average VOC (lbs/gal)**	**Usage (gallons)**
EB Groups	EB: inks, reducers and varnish	0.3	252,500
Press Chemicals	Fountain concentrate, abhesives, PH conditioner	2.85	9,200
Video/Ink Jet chemicals	Videojet ink and solvent, Inkjet ink and conditioner	1.67	640
Glue	Glue	0.45	4,200
Miscellaneous Chemicals	Blanket and press/roller wash, denatured alcohol, plate finisher	8.0	10,250
Cleaners	Plate cleaner & gum and floor cleaner	2.7	800

10. Any coating used in the rotogravure coater shall not exceed VOC emissions of 2.9 lbs per gallon of coating, excluding water, delivered to the coating applicator from the paper coating line.
[Rule 62-296.503(2), F.A.C.]

11. Compliance with the facility-wide general visible emission (VE) limitation shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-204.800, F.A.C. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

12. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of equipment) to believe that any applicable emission standard in Chapters 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the permittee of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

13. <u>VOC Content Determination</u>

A. Compliance with the VOC content limitations for printing inks and abhesives shall be determined using EPA Method 24A contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-297, F.A.C. The enclosed EPA VOC DATA SHEET (Properties of the Coating "AS SUPPLIED" by the manufacturer), designated <u>APPENDIX A</u>, shall be maintained on site for each coating and made available for inspection upon request of the Hillsborough County Environmental Protection Commission (EPC) or Department.

SPECIFIC CONDITIONS:

B. Compliance with the electron-beam coating(s) and varnish(s) VOC content limit of Specific Condition Nos. 10.A. shall be demonstrated by use of a modified EPA Method 24. In said modified EPA Method 24, samples shall first be prepared and weighed consistent with EPA Method 24, then be exposed to normal electron-beam radiation curing conditions, and then be heated consistent with EPA Method 24.

C. Compliance with VOC content limitations for all other VOC containing materials in Specific Condition No. 9 shall be demonstrated using Material Safety data Sheets for materials "as supplied" from the manufacturer.

[Permit No. 0570417-013-AC]

14. In order to document compliance with the facility VOC and HAP limitations of Specific Condition No. 5, and the material usage limitations of Specific Condition No. 9, and to document that the facility is in compliance with the NESHAP area source requirements of 40 CFR 63, Subpart KK in accordance with 40 CFR 63.829(d) (Recordkeeping Requirements), the facility shall maintain the following monthly records:

Monthly

A. Month, Year;
B. Electron-Beam Ink, Ink Reducer and Varnish Usage (gallons);
C. Fountain Solution Usage (gallons);
D. Abhesive Solution: Water-based and solvent-based abhesive; solvent solution, viscosity control agent
usage (gallons);
E. Ink Jet Ink and Conditioner Usage (gallons);
F. Glue Usage (gallons);
G. Cleaning Solution Usage (solution(s) and gallons of each)
H. VOC and HAP contents for each material above
I. VOC and HAP emissions from each material above based on material VOC and HAP content data

12- Consecutive Month Rolling Totals *(calculated at end of each month)*

A. Rolling 12 consecutive month usage totals of items B through G above;
B. Rolling 12 consecutive month total VOC and HAP emissions from each of the above material categories;

Usages may be based on inventory, purchase records (provided no materials used that are not purchased), and daily records. [Rule 62-4.070(3), F.A.C. and 40 CFR 63.829(d)]

15. As required by Rule 62-296.503, F.A.C. - Paper Coating (Rotogravure Coaters), the permittee

SPECIFIC CONDITIONS:

shall keep records in accordance with the requirements of Rule 62-296.500 (1)(b), F.A.C.

Daily

A. Day, Month, Year;
B. The amount and type of coating/abhesive usage (gallons) used in the rotogravure presses;
C. The VOC content as applied of each abhesive coating in the rotogravure presses;
E. VOC and HAP contents for each material used in the rotogravure presses;
F. Monthly VOC and HAP emissions from each material above based on material VOC and HAP content data

{Permitting Note: VOC content shall be calculated using a percent solids basis (less water and exempt solvents) for abhesives, coating, and inks, using EPA Reference Method 24. The EPC may accept, instead of the coating analysis methods required under paragraphs 62-296.500(2) (b) 2. and 3. F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings".}

16. At a minimum, all records and logs required by this permit shall be updated monthly, with entries made no later than 2 weeks after the end of each month. All records and logs required by this permit shall be recorded in a permanent form suitable for inspection by the EPC upon request, and shall be retained for at least a three (3) year period. [Rules 62-4.070(3), and 62-4.160 (14), F.A.C.]

17. As required by 40 CFR 63.820(a)(3) of 40 CFR 63, Subpart KK, the permittee shall keep records in accordance with the requirements of 40 CFR 63.829(d) and submit any applicable reports in accordance with the requirements of 40 CFR 63.830(b)(1).
[Rule 62-204.800(1), F.A.C. and 40 CFR 63 Subpart KK]

18. The permittee shall provide timely notification to the EPC 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, installation or addition of any equipment which is a source of air pollution, and may also require prior authorization before implementation: [Rule 62-210.300, F.A.C., and Permit No. 0570417-013-AC]

19. The permittee must submit to the Environmental Protection Commission of Hillsborough County 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. The AOR shall be submitted by April 1 of the following year

20. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a

SPECIFIC CONDITIONS:

renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the 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 the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director