



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

October 24, 2007

Mr. Alan Etheridge  
General Manager  
Nashua Corporation  
4801 Executive Park Court, Suite 110  
Jacksonville, Florida 32216

Dear Mr. Etheridge:

This is to acknowledge that your notification of intent to use the authority of Rule 62-210.310 to operate your facility was received on September 20, 2007. We have assigned ARMS # 0310553-001 to this facility.

As you know, pursuant to Florida Statutes section 403.814, authority to operate under general permits commences thirty days after receipt of the registration form unless you have been notified by this office that your facility has not shown entitlement to operate pursuant to the rule provisions.

For your information, authority to operate pursuant to Rule 62-210.310 expires after 5 years. Therefore, a new registration form must be received no later than 5 years after the date your notice was received as indicated above. If your general permit rule conditions require testing, such testing must be completed within the time frame specified in the rule.

If you have any additional questions, please contact Dickson Dibble at 850/921-9586.

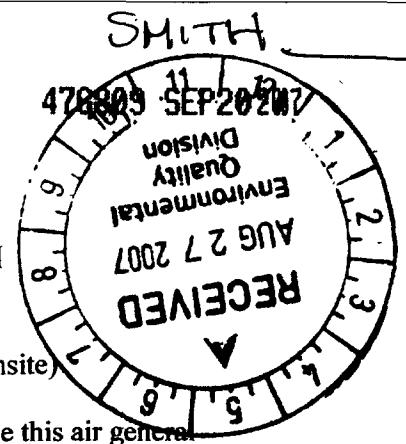
Sincerely,

*SFV* Sandra F. Veazey, Chief  
Bureau of Air Monitoring  
and Mobile Sources

SFV/pg

cc: Mr. Wayne Tutt, Duval County

**PRINTING OPERATIONS  
AIR GENERAL PERMIT REGISTRATION FORM**



**Part II. Notification to Permitting Office**  
(Detach and submit to appropriate permitting office; keep copy onsite)

**Instructions:** To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

**Registration Type**

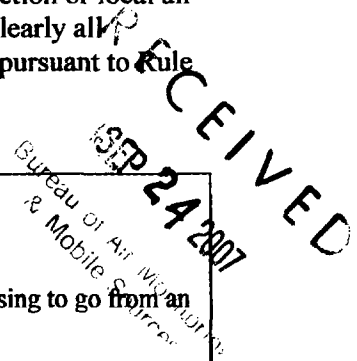
Check one:

**INITIAL REGISTRATION** - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

**RE-REGISTRATION** (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.



**Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only**

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s):
- No air operation permits currently exist for this facility.

**0310553-001**

**General Facility Information**

**Facility Owner/Company Name** (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

Nashua Corporation

**Site Name** (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

Jacksonville Plant

**Facility Location** (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 4801 Executive Park Court, Suite 110

City: Jacksonville

County: Duval

Zip Code: 32216

**Facility Start-Up Date** (Estimated start-up date of proposed new facility.)(N/A for existing facility)

n/a - existing facility

**Owner/Authorized Representative**

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Alan Etheridge, General Manager

Owner/Authorized Representative Mailing Address

Organization/Firm: Nashua Corporation

Street Address: 4801 Executive Park Court, Suite 110

City: Jacksonville

County: Duval

Zip Code: 32216

Owner/Authorized Representative Telephone Numbers

Telephone: (888) 810-6880 x. 8302

Fax: (904) 296-1507

Cell phone (optional):

**Facility Contact (If different from Owner/Authorized Representative)**

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: Mike West, Plant Manager

Facility Contact Mailing Address

Organization/Firm: Nashua Corporation

Street Address: 4801 Executive Park Court, Suite 110

City: Jacksonville

County: Duval

Zip Code: 32216

Facility Contact Telephone Numbers

Telephone: (904) 281-8309

Fax: (904) 296-1507

Cell phone (optional):

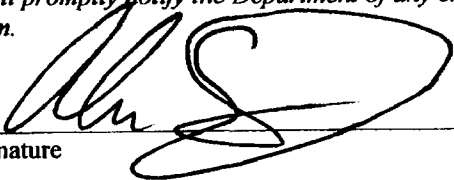
**Owner/Authorized Representative Statement**

This statement must be signed and dated by the person named above as owner or authorized representative

*I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.*

*I will promptly notify the Department of any changes to the information contained in this registration form.*

Signature



Date

7-9-07

**Printing Process/InkType(s)**

Check all that apply:

- Heatset Offset Lithographic
- Screen or Letterpress
- Flexographic

- Non-Heatset Offset Lithographic
- Water Based
- Rotogravure

- Digital
- Ultraviolet Cured

**Compliance Assurance - Initial Registration (Not Required for Re-Registration)**

Below, or as an attachment to this form, provide the method (mass balance or material usage rates) expected to be used to demonstrate compliance with Rule 62-210.310(4)(f)2., F.A.C. Provide the estimated amount of materials containing hazardous air pollutants and solvent-containing materials expected to be used over a 12-month period.

The mass balance approach was utilized to demonstrate compliance. The calculations are as follows for the materials/processes which will produce VOC and/or HAP emissions.

**Solvent Material**

Density = 8.01 lb/gallon  
Estimated usage in 12 months = 1550 gallons  
VOC content = 4.71 lb/gallon of VOC's  
HAP content = 0.28 wt % HAP's (Toluene)

Annual VOC's = 1550 gallons x 4.71 lb/gallon x 1 ton/2000 lb = 3.65 Tons VOC's  
Annual HAP's = 8.01 lb/gallon x 1550 gallons x 0.28% x 1 ton/2000 lb = 0.02 Tons HAP's (Toluene)

**Inks**

Estimated usage in 12 months = 6000 gallons  
Typical VOC content for inks = 0.50 lb/gallon  
Typical HAP content for inks = 0.45 lb/gallon (Glycol Ethers)

Annual VOC's = 6000 gallons x 0.50 lb/gallon x 1 ton/2000 lb = 1.5 Tons VOC's  
Annual HAP's = 6000 gallons x 0.45 lb/gallon x 1 ton/2000 lb = 1.35 Tons HAP's (Glycol Ethers)

**Plate Wash**

Estimated usage in 12 months = 1320 gallons  
VOC content = 7.31 lb/gallon

Annual VOC's = 1320 gallons x 7.31 lb/gallon x 1 ton/2000 lb = 4.82 Tons VOC's

There will also be trace amounts of emissions from the degreasing process which is not anticipated to be high enough to affect these estimates.

Estimated total VOC's for 12 months = 10.0 Tons  
Estimated total HAP's for 12 months = 1.37 Tons

**Compliance Determination - Re-Registration (Not Required for Initial Registration)**

Below, or as an attachment to this form, provide the highest 12-month total quantity of materials containing hazardous air pollutants and the highest 12-month total quantity of solvent-containing materials used in the last five years to show compliance with sub-subparagraph 62-210.310(4)(f)2.b., F.A.C. (material usage rates) or provide all calculations to show compliance with sub-subparagraph 62-210.310(4)(f)2.a., F.A.C. (mass balance).

n/a - initial registration

**Description of Facility**

Below, or as an attachment to this form, provide a description of the printing operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Information should include a description of the number and types of printing processes, presses and ink systems being used at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

This facility comprises seven (7) printing lines. All were manufactured by Mark Andy and all are flexographic printing presses. The facility currently operates 24 hours per day, 5 days per week.

All inks are water-based and the ink systems are original to the equipment. Currently, Nashua is developing a solvent-coating process to be utilized on one press. This process is anticipated to be successful and expand such that it is run 24 hours, 5 days per week on one press in the short term. Emissions data were calculated based on this expectation.

Additional processes that affect emissions are plate washing (included in calculations) and degreasing (minimal). Currently, there are no specific air pollution control measures or equipment in place.

# ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT

## Environmental Quality Division

August 30, 2007



### CERTIFIED-RETURN RECEIPT

Mr. Alan Etheridge, General Manager  
Nashua Corporation  
4801 Executive Park Court, Suite 110  
Jacksonville, FL 32216

**RE: Duval County - Air Pollution  
Nashua Corporation – Jacksonville Plant  
Printing Operation  
Check No. 01013458**

Dear Mr. Etheridge:

The City of Jacksonville, Environmental Resource Management Department, Environmental Quality Division (EQD) is in receipt of the above referenced application submitted August 27, 2007. Air General Permit Registration Forms for printers are processed at the Florida Department of Environmental Protection (FDEP) in Tallahassee.

Your registration form is being returned. A refund check will be mailed under separate cover.

Please resubmit the Air General Permit Registration Form and a check made payable to **FDEP** for the amount of **\$100.00** to:

**FDEP  
Receipts  
Post Box Office 3070  
Tallahassee, FL 32315-3070**

Should you have any questions concerning this matter, please contact Mr. Harry D. Smith at (904) 630-4900.

Very truly yours,

A handwritten signature in black ink that reads "Richard L. Robinson".

Richard L. Robinson, P.E., Manager  
Air Pollution Source Permitting Section

Richard L. Robinson

RLR/HDS/rdr

Enclosure

c: Rita Felton-Smith, FDEP, Northeast District (E-mail)  
EQD Air Permitting File  
EQD File: Misc. - N

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117 West Duval Street, Suite 225 Jacksonville, Florida 32202  
Air Quality: (904) 630-4900 Hazardous Materials: (904) 630-3404  
Groundwater: (904) 630-4900 Water Quality: (904) 630-3404

Fax: (904) 630-3638  
Web: [www.coj.net](http://www.coj.net)

*"Recipient of the 2001 Governor's Sterling Award"*

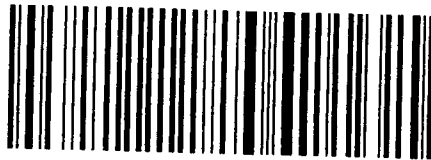
**Florida Department of Environmental Protection**  
**Cash Receiving Application (CRA)**  
**Cashlisting by Deposit #: 281166 thru 281166**  
**Printed: 9/20/2007 4:52:24 PM - Page 10**

Cashlisting: **64161**    Cashlist Area: **3755**    Description: **DIV OF AIR RESOURCES MGMT.**  
 Deposit No: **281166**    Date Deposited: **09/20/2007**    Contact: **PATTY ADAMS**

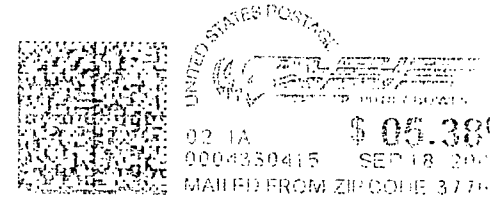
<u>Object</u>	<u>Transmittal</u>	<u>Dep DIN</u>	<u>Receipt Number</u>	<u>Pre-Numbered Receipt</u>	<u>Name</u>	<u>Check Number</u>	<u>Payment Amount</u>	<u>Reference Account</u>	<u>Payment Number</u>	<u>Remittance Number</u>	<u>Fund</u>
002272	44902	476809	600679		NASHUA CORP	01013621	\$100.00		840175	748881	PFTF
	44902	476819	600689		SUNBELT CRUSHING, LLC	025145	\$200.00		840185	748891	PFTF
<b>Object Code 002272 Subtotal:</b>							<b>\$300.00</b>				
002278	44902	476811	600681		MIAMI ENVIRONMENTAL & CONST. S	7158	\$200.00	40429	840177	748883	APCTF
<b>Object Code 002278 Subtotal:</b>							<b>\$200.00</b>				
<b>Cashlisting 64161 Total:</b>							<b>\$500.00</b>				



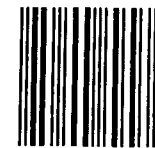
**Kim Randall**  
Corporate EH&S Manager  
Nashua Corporation  
1 Rittenhouse Road, Building 2  
Jefferson City, TN 37760



7006 0100 0003 8580 2932



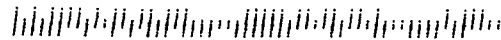
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www.nashua.com  
krandall@nashua.com  
865-471-0136 (Fax)  
865-712-9728 (Cell)  
865-471-1852  
Jefferson City, TN 37760  
1 Rittenhouse Road, Bldg. 2

**Kim Randall**  
Corporate Environmental,  
Safety, and Occupational  
Health Manager



NASHUA CORPORATION

FDEP  
Receipts  
Post Office Box 3070  
Tallahassee, FL 32315-3070