Permittee:
Smurfit-Stone Container Enterprises, Inc.
DI-NA-CAL Label Group, Jacksonville
3389 Powers Avenue
Jacksonville, FL 32207

FINAL Permit No.: 0310238-007-AC
Facility ID No.: 0310238
SIC No(s).: 27
Project: Synthetic Minor Permit
Packaging Label Printing Facility

This permit is for the construction/modification of a packaging label printing facility. This facility is located at 3389 Powers Avenue, Jacksonville, Duval County, FL 32207; UTM Coordinates: Zone 17, 440.20 km East and 3348.20 km North; Latitude: 30° 15' 55" North and Longitude: 81° 37' 18" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. 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 Environmental Resource Management Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: February 1, 2006

Expiration Date: April 30, 2006

Environmental Resource Management Department
Environmental Quality Division

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Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/RR/rdr

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Section I. Facility Information

Subsection A. Facility/Project Description

The operation of a packaging label printing facility. The existing facility has two (2) rotogravure printing presses and a narrow web (18 inches) press capable of flexographic and rotogravure printing. The label printing presses are enclosed in a Total Enclosure System (TES) for the 100% capture and transport of air pollutants to a regenerative thermal oxidizer. The proposed construction of the Tann Corporation Model TR 5092 Regenerative Thermal Oxidizer will result in a modification to Emissions Unit 007 – Packaging Label Printing Presses.

The facility is a synthetic minor source of air pollution because the operational limit assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Rule 62-210.200(254), FAC, and Rule 2.301, JEPB.

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

EU No.	EU Description	Control Device
007	Packaging Label Printing Presses	Tann Corporation Model TR 5092 Regenerative Thermal Oxidizer

Subsection C. Relevant documents
Permit No.: 0310238-004-AF
Permit No.: 0310238-005-AC
Air construction permit application received September 13, 2005

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific process and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
    a. Have access to and copy any records that must be kept under conditions of the permit;
    b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
    c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

    Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
    a. A description of and cause of noncompliance; and
    b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

    ( ) Compliance with New Source Performance Standards

(X) Determination of Lowest Achievable Emission Rate (LAER)
(X) Compliance with National Emission Standards for Hazardous Air Pollutants

14. The permittee shall comply with the following:
    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
    c. Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The date(s) analyses were performed;
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[Rule 62-4.160, FAC, and Rule 2.1301, Jacksonville Environmental Protection Board (JEPB).]

Subsection B. Specific Conditions

1. Permittee shall notify the Department fifteen (15) days prior to EU testing.
   [Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, JEPB.]

2. Copies of the test report(s) shall be submitted to the Department within forty-five (45) days of completion of testing.
   [Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB.]

3. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then EU may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
   [Rule 62-297.310(2), FAC, and Rule 2.1101, JEPB]

4. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing.
   [Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB.]

5. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB.]

6. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB.

7. Permittee shall submit an annual operation report to the Department for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before March 1.
[Rule 62-210.370(3), FAC, and Rule 2.301, JEPB.]

8. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
[Rule 62-4.080(3), FAC, and Rule 2.1301, JEPB.]

9. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance records and test results, to the Department ninety (90) days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate.
[Rule 62-210.300(2), FAC, and Rule 2.301, JEPB.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to:

Environmental Resource Management Department
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
Telephone: (904) 630-4900
Fax: (904) 630-3638

Section III. Emission Units and Conditions

Emission Unit No. 007- Packaging Label Printing Presses

Emission Unit Description – Two (2) wide web rotogravure printing presses and a narrow web flexographic and rotogravure printing press

Control Device – Tann Corporation Model TR 5092 Regenerative Thermal Oxidizer

Essential Potential to Emit (PTE) Parameters

1. The maximum allowable Volatile Organic Compounds (VOC) substrate loading shall not exceed the following:

	pounds/hour
Press No. 4	287.5
Press No. 5	287.5
Press No. 6	150.0

[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

2. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year/press.
[Rule 62-210.200(203),FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. VOC emissions shall not exceed 28.8 pounds per hour and 95.0 tons per year on a 12 month rolling average.
   [Rule 62-212.500(7), FAC and Rule 2.401, JEPB]

4. Hazardous Air Pollutant (HAP) emissions shall not exceed 9.5 tons per year for any single HAP and 23.5 tons per year for total HAP on a 12 month rolling average.
   [Rule 62-210.200(254), FAC, Rule 2.301, JEPB and Applicant's Request]

5. The capture/transport efficiency of the TES shall be 100%.
   [Rule 62-212.500(7), FAC and Rule 2.401, JEPB]

6. The minimum VOC/HAP destruction efficiency of the regenerative thermal oxidizer shall be 95%.
   [Rule 62-212.500(7), FAC and Rule 2.401, JEPB]

7. The combustion zone temperature of the combustion chamber shall be initially maintained at a minimum of 1,400 ^{o}F during operation of the presses. The minimum temperature may be reestablished upon demonstration of compliance.
   [Rule 62-212.500(7), FAC and Rule 2.401, JEPB]

8. Visible emissions (VE) shall not exceed 5 percent opacity except that VE not exceeding 20 percent opacity are allowed for up to 3 minutes in any one hour period.
   [Rule 62-296.401(1), FAC, and 2.1001, JEPB.]

9. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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(2), FAC, and Rule 2.1001, JEPB.]

10. This facility shall be considered an area source in accordance with 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

Test Methods and Procedures

11. Testing for demonstration of compliance shall be performed, upon request, in accordance with EPA Reference Method (RM) 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity.
    [Rule 62-297.401, FAC, and Rule 2.1101, JEPB.]

12. The capture/transport efficiency of the TES shall be demonstrated by meeting the requirements and procedures specified in EPA Reference Method 204.
    a. The pressure drop sensor, which controls the dampers, shall be calibrated in accordance with recommendations of the manufacturer with regard to frequency and methodology.
    b. Permittee shall install a device to continuously record the pressure drop across the enclosure during the EPA Method 204 testing.
    c. The pressure drop shall be the average of the readings recorded during the test.
    d. The Department retains the right after the initial demonstration of compliance to require the Permittee to verify compliance with the permanent TES criteria, if after investigation, it is believed that these methods are necessary to accurately assess the compliance status of the affected source.

    [Rule 62-297.450, FAC, and Rule 2.1101, JEPB.]

13. Testing for demonstration of compliance by determining the inlet and outlet VOC concentrations shall be performed in accordance with EPA RM 25A (as described in 40 CFR 60, Appendix A) for VOC destruction efficiency of the regenerative thermal oxidizer. Dividing the outlet concentration by the inlet concentration will provide the penetration. Destruction Efficiency = 1 - Penetration

[Rule 62-297.401, FAC, and Rule 2.1101, JEPB.]

14. Testing for demonstration of compliance shall be performed in accordance with EPA RM 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturers data sheets with VOC contents may be substituted with the approval of the Department.
[Rule 62-296.513(4), FAC and Rule 2.1001, JEPB.]

15. VOC destruction efficiency shall be performed with presses No. 4, No. 5 and No. 6 operating at maximum conditions during testing. A 95% total destruction of all VOC emissions delivered to the inlet of the regenerative thermal oxidizer shall be demonstrated by each compliance test.
[Rule 62-210.200(254), FAC, Rule 2.301, JEPB]

16. Demonstration of compliance testing shall be conducted within 180 days of the initial startup of the regenerative thermal oxidizer.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

Recordkeeping and Reporting Requirements

17. The amount of the total VOC applied to the substrate shall be determined monthly on a weight basis.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

18. The amount of each HAP and total HAP applied to the substrate shall be determined monthly on a weight basis using the following procedure. The weight percent (%) of each HAP in the inks (coating and solvent), as determined from the manufacturer's analysis. Each single HAP weight applied and total HAP applied shall be recorded.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

19. The combustion zone temperature of the regenerative thermal oxidizer shall be recorded at all times and the data shall be maintained at the facility for at least five years. All down time and maintenance of the regenerative thermal oxidizer shall be documented (i.e., date, times, and reason for downtime) and maintained at the facility.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

20. Reports and recordkeeping shall be in accordance with the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

21. Records shall be compiled and maintained on a monthly basis for VOC emissions, and HAP (total and individual) emissions.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

22. Records shall be maintained on a monthly basis for a minimum of five (5) years and made available to the Department upon request.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB.]

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to S.120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____

Clerk Date