



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castille
Secretary

NOTICE OF PERMIT

ELECTRONIC MAIL

satish@ninaoplastics.com

Nina Plastic Bags, Inc.
7549 Brokerage Drive
Orlando, Florida 32809-5625

Attention: Satish Sharma, Owner/CEO

Orange County - AP

Add new flexographic printing press and replace pollution control device

DEP File Number: 0950052-010-AC

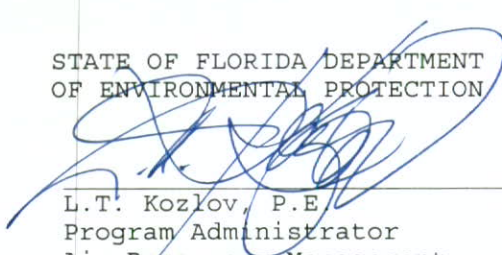
Dear Mr. Sharma:

Enclosed is Permit Number 0950052-010-AC to construct the above referenced facility issued pursuant to Section(s) 403.087, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68 F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the permitting authority in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Date: 11-21-06

"More Protection, Less Process"

Printed on recycled paper.

Filed, on this date, pursuant to Section 120.52, F.S.,
with the designated Department Clerk, receipt of which
is hereby acknowledged.

036
JR

LTK/jar

Dina Jones
Clerk

Nov 21, 2006
Date

cc: Hamp Pridgen, Air Section Manager, Orange County EPD, (Hamp.Pridgen@ocfl.net)
Roger Caldwell, V.P., Environmental Division, (roger@bottorf.com)
Douglas Bauman, P.E., General Environmental Engineering, (doug4ucf@earthlink.net)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were
mailed before the close of business on Nov. 21, 2006 to the listed
persons, by Hagner.



Department of Environmental Protection

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Permittee:
Nina Plastic Bags, Inc.
7549 Brokerage Drive
Orlando, FL 32809-5625

Attention: Satish Sharma,
Owner/CEO

Facility Number: 0950052
Permit Number: 0950052-010-AC
Expiration Date: November 30, 2007
County: Orange
Latitude/Longitude:
28° 27' 12"N/81° 24' 51"W
Project: Construction Permit - Add new
flexographic printing press and replace
pollution control device

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. 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 department and made a part hereof and specifically described as follows:

The permittee may construct (install) a new flexographic printing press, Windmoeller & Hoelscher, model 8656 Olympia Starflex. Additionally, the permittee may replace the existing pollution control device (CVM catalytic incinerator, model 10-CI-Mno 5) with a new pollution control device (CMM Group, LLC, regenerative thermal oxidizer, model no. RTO-15000-M-95).

The permittee may operate a printing facility as a synthetic minor facility in accordance with Rule 62-210.300(2)(b), F.A.C. The air emission activities at the facility include the following:

- a) Printing Press No. 1 - Omat tortona, serie (series) 6AZ, model #100/110. Electric heat dries the ink.
- b) Printing Press No. 3 - Omat tortona, serie (series) scan flex. Electric heat dries the ink.
- c) Printing Press No. 4 - Windmoeller & Hoelscher, model novaflex. Gas heat dries the ink.
- d) Printing Press No. 5 - Windmoeller & Hoelscher, model astra flex. Gas heat dries the ink.

Until it is replaced, the catalytic incinerator will control the VOC emissions from the existing printing presses (No. 1, 3, 4, and 5). After it is replaced, the regenerative thermal oxidizer will control emissions from the 4 existing printing presses and the new printing press (No. 2). This permit replaces and supersedes all previous Department air permits. The facility is classified as a synthetic non-Title V source, and is located at 7549 Brokerage Drive, Orlando, Orange County, Florida.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.) 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 processes 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), F.S., 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 acknowledgment 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 and 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 this 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 for revocation of this permit.

GENERAL CONDITIONS:

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 Section 403.111 and 403.73, F.S. 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 Rule 62-4.120 and Rule 62-730.300, Florida Administrative Code (F.A.C.), as applicable. The permittee shall be liable for any non-compliance 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
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 information) required by the 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 dates 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 the 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.

Operating Conditions

1. The usage rates for N-Propyl Acetate, N-Propyl Alcohol, and Ink at the facility are limited to less than 15 tons, 120 tons, and 148 tons per consecutive 12 months, respectively.
[Rule 62-210.200, (PTE), F.A.C.]
2. No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOCs) or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department [Rule 62-296.320(1)(a), F.A.C.]. To comply, procedures to minimize pollutant emissions should include but not be limited to the following:
 - a) tightly cover or close all VOC containers when they are not in use,
 - b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
 - c) maintain all piping, valves, fittings, etc. in good operating condition,
 - d) prevent excessive air turbulence across exposed VOCs,
 - e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal
3. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as 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.
[Rule 62-296.320(2), F.A.C.]
4. The oxidizer shall be fired by natural gas only.
[Rule 62-210.200, (PTE), F.A.C.]
5. No person shall circumvent any pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

Emission Limits

6. For the facility, VOC emissions are limited to less than 29.9 tons per consecutive 12 months, combined HAP emissions are limited to less than 25.0 tons per consecutive 12 months, and any single HAP emission is limited to less than 10.0 tons per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C.]
7. The visible emissions for each source are limited to less than 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

8. In order to demonstrate compliance with specific condition numbers 1 and 6, and pursuant to Rule 62-4.070(3), F.A.C., the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

- a) Designation of the month and year of operation for which the records are being tabulated; and
 - b) Consecutive 12-month total of total VOC, combined HAPS, and individual HAPS emission rates.
 - c) Usage rates for N-Propyl Acetate, N-Propyl Alcohol, and Ink
 - d) Combustion chamber set point (degrees Fahrenheit)
- [Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

9. Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.
- [Rules 62-4.070(3), F.A.C.]

10. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years and made available to the Department. The monthly logs shall be completed by the end of the following month.
- [Rules 62-4.070(3), F.A.C.]

11. Combustion chamber set point shall be 1500 degrees Fahrenheit.
- [Rule 62-4.070(3), F.A.C.]

12. Provide reasonable assurance documentation regarding capture efficiency of the ductwork during compliance testing.
- [Rule 62-4.070(3), F.A.C.]

13. **At least 60 days prior to the expiration date of this permit**, the destruction efficiency of the regenerative thermal oxidizer shall be demonstrated by determining the inlet and outlet VOC emissions:

- a) The inlet VOC quantity shall be determined by using the VOC of the inks using Method 24.
 - b) The outlet VOC quantity shall be determined by using Method 25 or 25A.
 - c) The destruction efficiency of the oxidizer shall be at least 90 percent.
 - d) The oxidizer temperature shall be reported.
 - e) Visible emissions shall be determined by DEP Method 9.
- [Rule 62-297.310(7)(a)1., and 62-297.401(25)(a), F.A.C.]

14. Control Technology. No owner or operator of a packaging rotogravure, publication rotogravure, or flexographic printing operation subject to Rule 62-296.515, F.A.C. and employing solvent containing ink shall cause, allow or permit the operation of a facility unless:
 - a) The volatile fraction as it is applied to the substrate, contains 25 percent by volume or less of organic solvent and 75 percent by volume or more of water; or,
 - b) The ink as it is applied to the substrate, less water, containing 60 percent by volume or more nonvolatile material; or
 - c) An incineration system is employed which oxidizes at least 90 percent of the volatile organic compounds (VOC measured as total combustible carbon) to carbon dioxide and water.
[Rule 62-296.515, (PTE), F.A.C.]
15. Test Methods and Procedures. All emission test performed pursuant to the requirements of this rule [Rule 62-296.515, F.A.C.] shall comply with the following requirements:
 - a) Low Solvent Technology. The test method for the volatile organic compounds shall be EPA Method 24, 24A, or EPA 450/3-84-019, incorporated and adopted by reference in Chapter 62-297, F.A.C.
 - b) Add-on Control Device
 1. Destructive. The test method for volatile organic compounds shall be EPA Method 25 or Attachment 3 of EPA/2-78-041, with equipment specifications per Industrial Ventilation Manual, incorporated and adopted by reference in Chapter 62-297, F.A.C.
 2. Non-destructive. The test method for volatile organic compounds shall be EPA VOC Capture Efficiency Test Procedures subsection 62-297.440(7), F.A.C. The sampling time for each capture efficiency test run shall be at least 8 hours, unless otherwise approved by the Department pursuant to Rule 62-297.620, F.A.C.
 - c) Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.515(3), F.A.C.]
16. The owner or operator shall notify the Orange County Environmental Protection Division, at least 15 days prior to the date on which each formal compliance test is due to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7)(a)9., F.A.C.]

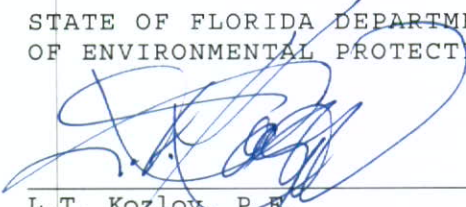
17. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]
18. The owner or operator shall submit a copy of the compliance test results to the Orange County Environmental Protection Division within 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8)(b), F.A.C.]
19. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C. "Annual Operating Report for Air Pollutant Emitting Facility", including the Emissions Report, for each calendar year and submit to the Orange County Environmental Protection Division on or before March 1 of the following year.
[Rule 62-210.370(3), F.A.C.]

Permit Application

20. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the department in writing at least 90 days prior to the expiration of the construction permit and submit an application for an extension of the construction permit.

An operating permit is required for operation of this source. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and submit the application fee, along with compliance test results and Application for Air Permit to the Department's Central Florida District office. **The application shall be submitted no later than 90 days after completion of construction of the new flexographic printing press (No. 2) and the regenerative thermal oxidizer.**
[Rule 62-4.220, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Issued: _____

11-21-06