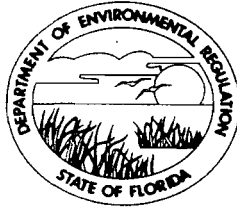


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 4, 1983

Mr. Christopher C. Mazura
Chief Executive Officer
Arnold Cellophane Corporation
20400 SW 112th Avenue
Miami, Florida 33157

Dear Mr. Mazura:

The bureau is in receipt of your request to extend the expiration date of the construction permit, No. AC 13-55914. The request is acceptable and the following condition is changed:

Expiration Date:

From: February 28, 1983
To: December 31, 1983

Attachment to be incorporated is:

5. Mr. Kenneth H. Speckhals' letter dated July 19, 1983.

This letter and attachment must be attached to your permit, No. AC 13-55914, and shall become a part of that permit.

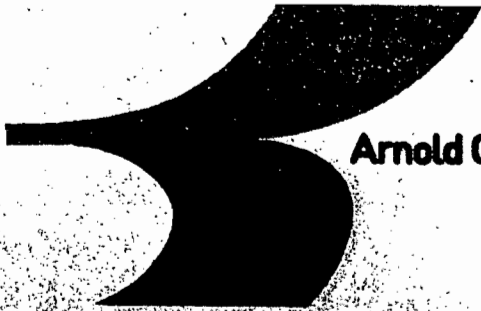
Sincerely,


Victoria J. Tschinkel
Secretary

VJT/bmm

cc: D. M. Ambrose
Tom Tittle
Ed Cahill
Nancy Wright

ATTACHMENT 5



Arnold Cellophane Corporation 20400 Southwest 112th Avenue - PO Box 570370
Miami - Florida 33157

Telephone 305 238-5961 - Telex 803360

DER
JUL 27 1983
BAQM

July 19, 1983

Mr. Clair Fancy
Department of Environmental Regulations
Twin Towers Office Building
2600 Blackstone Road
Tallahassee, Florida 32301

RE: ARNOLD CELLOPHANE CORPORATION'S CONSTRUCTION PERMIT FAC13-55914
FOR A FLEXOGRAPHIC PRINTING PRESS

Dear Mr. Fancy:

On May 11, 1983, I requested an extension of time to complete construction of the above press. We felt we would be able to have the press operational by June 31st. Unfortunately, we will not be able to meet our projected date because of mechanical difficulty, which has been delaying the development of low solvent technology materials. We have also been unable to get certification of the mill relating to the averaging on V.O.C. content of the ends being used on that press.

Please extend our construction permit until December 31, 1983, with the understanding that we will apply for an operating permit sooner if we are able to resolve these problems.

[Handwritten signature]

CC: Mr. [unclear] Tattle, DER Palm Beach
Mr. [unclear] Landers

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

MEMORANDUM

TO: Christopher C. Mazura, Arnold Cellophane Corporation
D. E. Ambrose, P.E.
Jim Williams, FDER, SFS
Pat Wong, Dade County ERM

FROM: *BT for* C. H. Fancy, Bureau of Air Quality Management

DATE: August 9, 1982

SUBJECT: Preliminary Determination - Arnold Cellophane Corporation Application to Construct New Flexographic Press.

Attached is one copy of the application, Technical Evaluation and Preliminary Determination, and proposed permit to construct a new flexographic press at the applicant's existing facility in Miami, Dade County.

Please submit any comments you may have concerning this action, in writing, to Bill Thomas of the Bureau of Air Quality Management.

CF:TP:ras

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to the Arnold Cellophane Corporation for the construction of a new flexographic press at their facility in Miami, Dade County, Florida. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

Department of Environmental
Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Department of Environmental
Regulation
South Florida Subdistrict
3301 Gun Club Road
P.O. Box 3858
West Palm Beach, Florida 33402

Dade County Department of
Environmental Resources Management
Southeast 1st Avenue
Brickell Plaza
Miami, Florida 33031

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

Arnold Cellophane Corporation
Dade County, Florida

Flexographic Press (P-6)

Application Number:

AC 13-55914

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

August 9, 1982

I. Project Description

A. Applicant

Arnold Cellophane Corporation
20400 S. W. 112th Avenue
Miami, Florida 33157

B. Project and Location

The applicant proposes to install a new flexographic press for the production of flexible packaging materials at their existing plant in Miami. The plant is located at 20400 S. W. 112th Avenue; the UTM coordinates are 563.2 km East and 2828.6 km North.

C. Process and Controls

The plant manufactures a variety of films (mostly polypropylene films) used for packaging materials. Currently there are four presses for printing, in addition to coating/laminating lines used at the plant. The applicant employs low solvent inks and coating at the plant as control technology to reduce Volatile Organic Compounds (VOC) emissions from the solvents used; the additional press (P-6) will also use low solvent or high solids inks.

Process changes are frequent due to the customized nature of this type of industry. Inks and coatings vary, depending upon the

type of substrate and client specifications. Ink and coating usage figures supplied by the applicant for the new press are best estimates, based on past experience with similar presses. Operation of one of the older presses will be phased out eventually, however the applicant wishes to have the option to continue use of all existing presses at this time. Therefore, operating permits for the existing presses will continue in force until the applicant notifies the Department otherwise.

II. Rule Applicability

The existing facility is classified as a major emitting facility as defined in Chapter 17-2, Florida Administrative Code (FAC), because potential emissions exceed 100 tons per year of VOC pollutants. VOC are precursors to the criteria pollutant ozone, and are thus regulated under federal and state regulations. Since the plant is located within the Dade County Nonattainment Area for Ozone (i.e., ambient air levels of ozone exceed the ambient air quality standard for ozone), modifications are potentially subject to Section 17-2.510, FAC, New Source Review for Nonattainment Areas. In addition, the new press is, as a minimum, required to use Reasonably Available Control Technology (RACT) to reduce VOC emissions, in accordance with Section 17-2.650(1)(f)16., the RACT standard for Graphic Arts Systems, which calls for either: 1) low solvent or high solids inks; or 2) incineration of at least 90% of potential VOC emissions. The applicant has opted for the former.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The RACT standard limits inks as they are applied to the substrate to either 1) a volatile fraction (solvent and water) containing 25 percent by volume or less of organic solvent and 75 percent by volume or more of water; or 2) 60 percent by volume or more nonvolatile material (solids), less water content.

Section 17-2.510, FAC, allows modifications resulting in increases of up to 40 tons per year VOC pollutants before they would be classified as "significant" and thus subject to the Preconstruction Review Requirements of 17-2.510(4). When a net contemporaneous emissions increase would reach or exceed this level, the source would be required to use the Lowest Achievable Emission Rate (LAER) technology to control emissions, and would also have to comply with the Statewide Compliance and Emissions Offset requirements.

The applicant has estimated annual potential VOC emissions from the new press to be 30.3 tons, based on average annual ink consumptions of other presses

B. Air Quality Analysis

Although emissions may increase as a result of this project, the possible increases allowed in the proposed permit would not significantly affect air quality in the area.

IV. Conclusions

The Department is satisfied that emissions resulting from the new press will not exceed levels required by the RACT standard for

graphic arts systems.

The applicant will be required to record ink, coating, and solvent usage such that a significant increase in plant-wide VOC emissions, over existing levels, will not occur without prior notification to the Department and application for a LAER permit.

The General and Specific Conditions are listed in the attached proposed permit.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: Arnold Cellophane Corporation
20400 S. W. 112th Avenue
Miami, Florida 33157

PERMIT/CERTIFICATION
NO. AC 13-55914

COUNTY: Dade

PROJECT: Flexographic
Press (P-6)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2
and 17-4, Florida Administrative Code. The above-named applicant, hereinafter called Permittee, is hereby authorized to
perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and
made a part hereof and specifically described as follows:

For the construction of a Flexographic Press (P-6), using low solvent or
high solids inks, for the manufacture of flexible packaging materials.
Solvent content of inks used will be in accordance with the RACT
standard contained in 17-2.650(1)(f)16., FAC.

Attachments:

1. Application to Construct Air Pollution Sources, DER form
17-1.122(16).
2. Letter of Incompleteness from Clair Fancy, dated June 17, 1982.
3. Response to Incompleteness letter from Kenneth Speckhals, dated
July 13, 1982.

PERMIT NO.: AC 13-55914
APPLICANT: Arnold Cellophane Corporation

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions," and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue; and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. 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.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

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)

PERMIT NO.: AC 13-55914
APPLICANT: Arnold Cellophane Corporation

SPECIFIC CONDITIONS:

1. Inks used in Flexographic Press (P-6), as they are applied to the substrate shall either: a) contain 25 percent by volume or less of organic solvent and 75 percent by volume or more of water, in the volatile fraction; or b) contain 60 percent or more by volume nonvolatile material, less water.
2. Records shall be kept of the amounts of inks, coatings, and solvents (including those used for cleanup) purchased for all operations permitted at the plant. Information necessary to verify compliance with the RACT standards, including certified analyses of ink and coating solvent content by the supplier, is also required in the records. The records shall be made available to the Department or its designee upon request.
3. The hours of operation for the Press P-6 shall not exceed 24 hours per day, 5 days per week, and 52 weeks per year, or 6240 hours per year.
4. Compliance with the RACT standards shall be verified annually in the form of a compliance report submitted to the Department or its designee. This report shall include ink, coating, and solvent usage for all presses and coating applicators in use at the facility, including the new press (P-6). The report shall also include solvent contents of all inks and coatings used as certified by the suppliers. VOC emissions calculated from usage and solvent content records are also required in the annual compliance report.
5. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to the Department or its designee. Full operation of the source may then be conducted in compliance with the terms of this permit until expiration of this permit or receipt of an operating permit.

PERMIT NO.: AC 13-55914
APPLICANT: Arnold Cellophane Corporation

Expiration Date: February 28, 1983

Issued this _____ day of _____, 19_____.

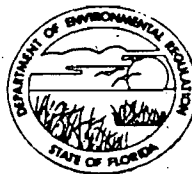
_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature

PAGE _____ OF _____

RECEIVED
MAY 20 1982



DER

PAID
MAY 20 1982

Dept. of Environmental Reg.
West Palm Beach

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT
AIR POLLUTION SOURCE

Dept. of Environmental Reg.
West Palm Beach

SOURCE TYPE: Graphic Arts & Paper Coating [] New Existing

APPLICATION TYPE: Construction [] Operation [] Modification

COMPANY NAME: Arnold Cellophane Corporation COUNTY: Dade

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) _____

SOURCE LOCATION: Street 20400 S.W. 112th Ave. City Miami

UTM: East 17:563.2 KmE North 2828.6 KmN

Latitude _____ ° _____ ' _____ "N Longitude _____ ° _____ ' _____ "W

APPLICANT NAME AND TITLE: Christopher C. Mazura, Chief Executive Officer

APPLICANT ADDRESS: Arnold Cellophane Corp., 20400S.W. 112th Ave., Miami, Fl. 33157

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Arnold Cellophane Corporation

I certify that the statements made in this application for a air pollution source permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Christopher C. Mazura
Christopher C. Mazura, Chief Executive Officer
Name and Title (Please Type)
Date: 4/15/82 Telephone No. 238-5961

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: D.M. Ambrose
D.M. Ambrose, P.E.
Name (Please Type)

(Affix Seal)

D.M. AMBROSE ASSOCIATES, INC.
Company Name (Please Type)

6190 North Federal Highway, Boca Raton,
Mailing Address (Please Type) Fla. 33431

Florida Registration No. 12831 Date: 4/15/82 Telephone No. (305)997-6790

¹See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.
This application for permit is to install one Rhexographic printing press which will employ low solvent techniques as discussed on attachment.

B. Schedule of project covered in this application (Construction Permit Application Only)
 Start of Construction June 1, 1982 Completion of Construction June 30, 1982

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)
The use of LST will result in higher material and operating costs which at present are under review. New printing press is equipped to better handle and use low solvent material.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
AO 13-50662, expiration date December 31, 1982

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes No

F. Normal equipment operating time: hrs/day 24 ; days/wk 5 ; wks/yr 52 ; if power plant, hrs/yr no ;
 if seasonal, describe: _____

G. If this is a new source or major modification, answer the following questions. (Yes or No)

- | | |
|---|-----|
| 1. Is this source in a non-attainment area for a particular pollutant? | YES |
| a. If yes, has "offset" been applied? | NO |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | NO |
| c. If yes, list non-attainment pollutants. | |
| <hr/> | |
| 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. | YES |
| 3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. | NO |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? | NO |
| 5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? | NO |

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Flexographic Inks	VOC	40	33.6*	P-6 new press

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: - Anticipated with adoption of LST for P-6

Name of Contaminant	Emission ¹		Allowed Emission ² Rate per Ch. 17-2, F.A.C.	Allowable ³ Emission lbs/hr	Potential Emission ⁴		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Ethyl Alcohol	4.81	15.0					P-6
N. Propylalcohol	14.89	15.3					flexo press

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles ⁵ Size Collected (in microns)	Basis for Efficiency (Sec. V, It ⁵)
None				

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g., Section 17-2.05(8) Table II, E. (1), F.A.C. - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3)

⁵If Applicable

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	0.002137	0.002779	2.779

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Solid wastes approximate 6,000 lbs./day as land fill liquid wastes approximate 250 lbs./day reclaimed by distillation. Hazardous wastes are sent to EPA approved land fills in Alabama.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated	NOT	USED					

NOT APPLICABLE

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight — show derivation.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
 Yes No

Contaminant	Rate or Concentration
GRAPHIC ARTS SYSTEM COATING VOC	25% volume VOC/75% water or
	40% volume VOC/60% ink solids

B. Has EPA declared the best available control technology for this class of sources (if yes, attach copy) Yes No

Contaminant	Rate or Concentration
GRAPHIC ARTS SYSTEM COATING VOC	25% volume VOC/75% water or
	40% volume VOC/60% ink solids

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- 1. Control Device/System:
- 2. Operating Principles:
- 3. Efficiency:*
- 4. Capital Costs:
- 5. Useful Life:
- 6. Operating Costs:
- 7. Energy:
- 8. Maintenance Cost:
- 9. Emissions:

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

10. Stack Parameters:

- | | | | |
|---------------|------|-----------------|-----|
| a. Height: | ft. | b. Diameter: | ft. |
| c. Flow Rate: | ACFM | d. Temperature: | °F |
| e. Velocity: | FPS | | |

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy*:
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy**:
- h. Maintenance Costs:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

*Explain method of determining efficiency.

**Energy to be reported in units of electrical power – KWH design rate.

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- h. Maintenance Cost:

*Explain method of determining efficiency above.

- i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space and operate within proposed levels:
- 4.
- a. Control Device
 - b. Operating Principles:
 - c. Efficiency*:
 - d. Capital Cost:
 - e. Life:
 - f. Operating Cost:
 - g. Energy:
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency*:
- 3. Capital Cost:
- 4. Life:
- 5. Operating Cost:
- 6. Energy:
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

a.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:
- (5) Environmental Manager:
- (6) Telephone No.:

*Explain method of determining efficiency above.

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

b.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

(5) Environmental Manager: KENNETH H. SPECKHALS

(6) Telephone No.: (305) 238-5961

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

10. Reason for selection and description of systems:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

State of Florida



Department of State

I certify from the records of this office that ARNOLD CELLOPHANE CORPORATION, is a corporation organized under the Laws of the State of Florida.

The Charter Number for this corporation is 176675.

I further certify that said corporation has paid all fees due this office through December 31, 1981, and its status is active, as shown by the records of this office.

Given under my hand and the
Great Seal of the State of Florida,
at Tallahassee, the Capital, this the
9th day of December, 1981



George Firestone
Secretary of State



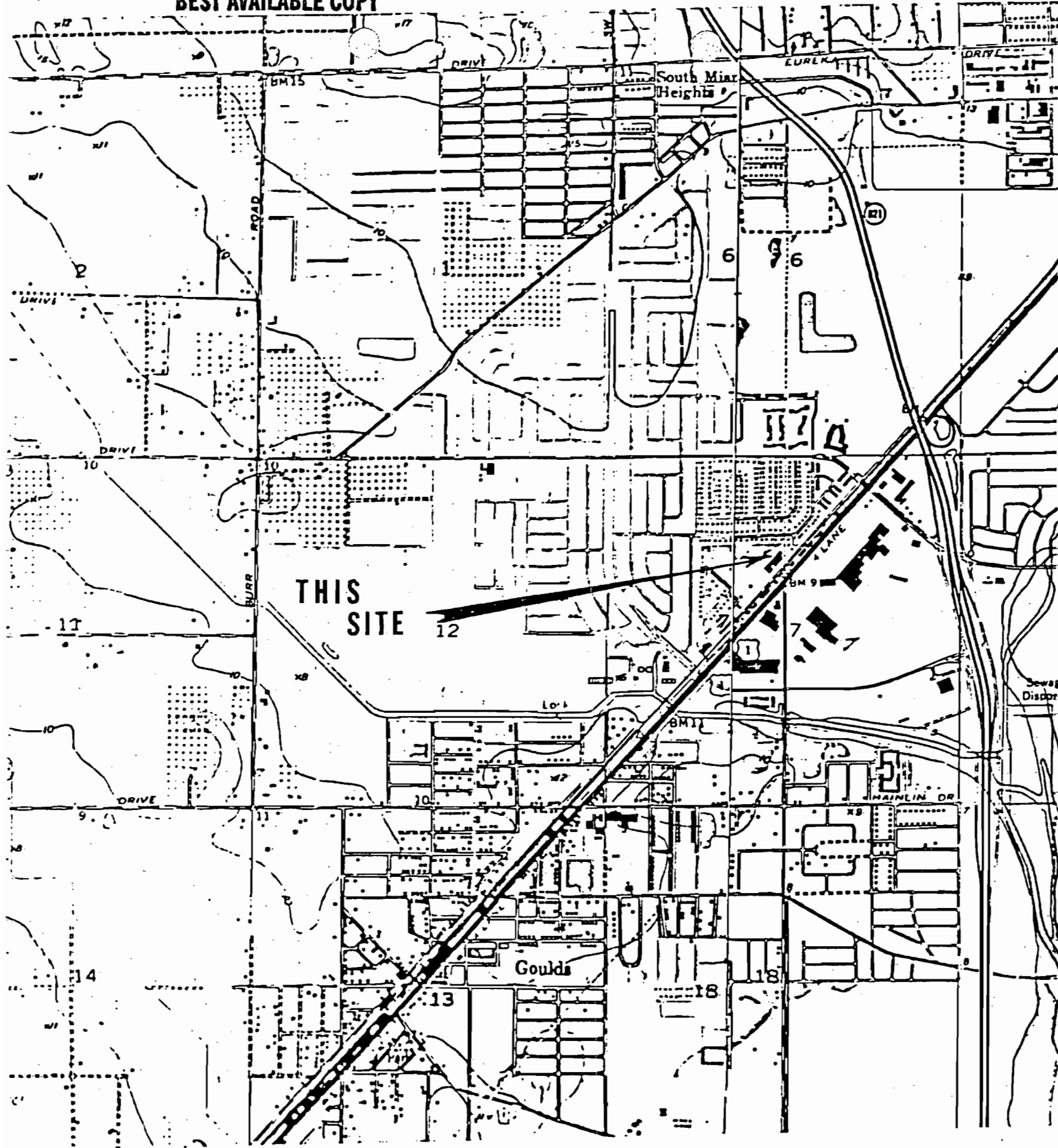
Arnold Cellophane Corporation 20400 Southwest 112th Avenue · PO Box 570370
Miami · Florida 33157

Telephone 305 238-5961 Telex 803360

ATTACHMENT TO SECTION II A

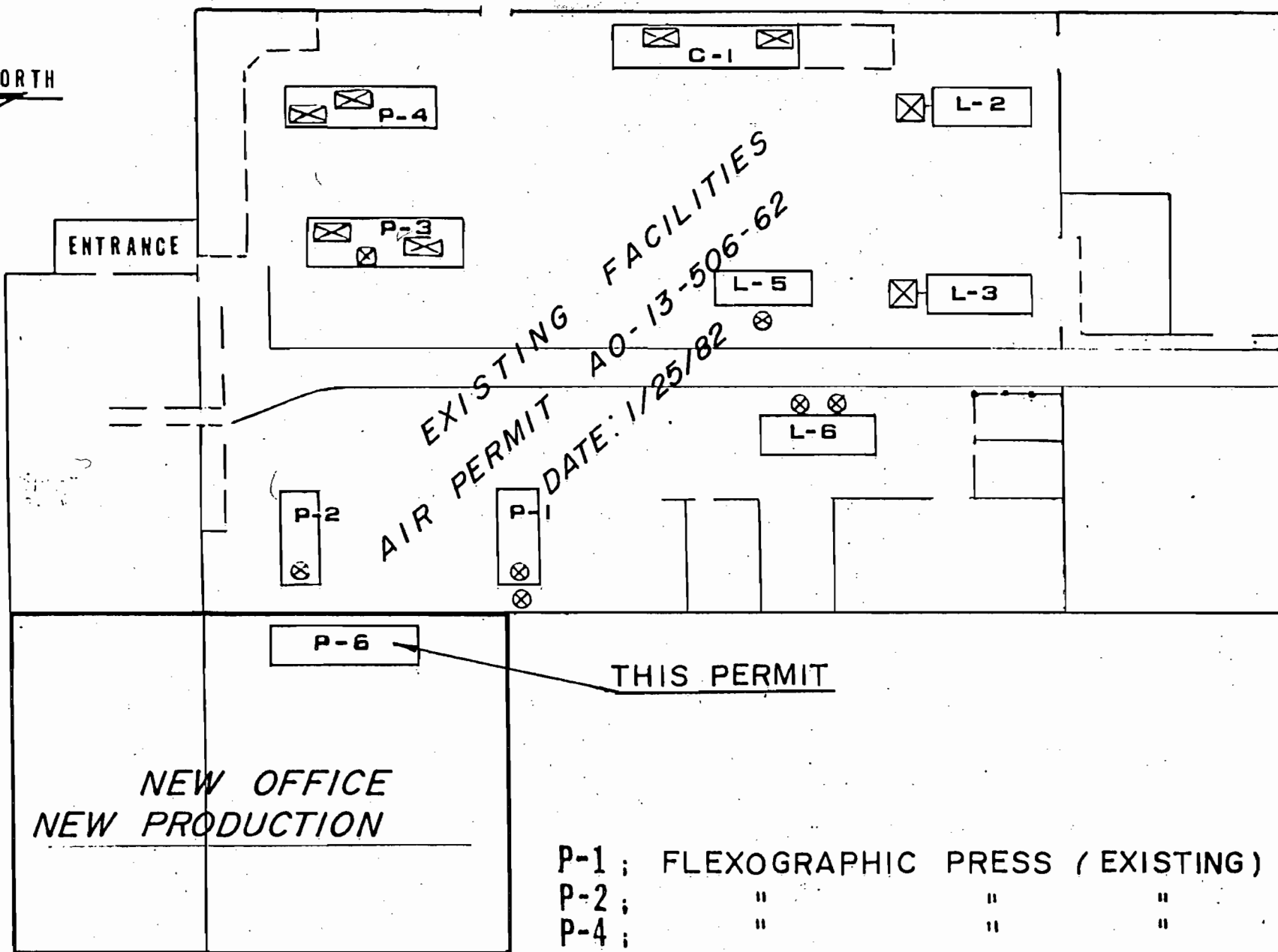
Arnold Cellophane Corporation is a producer or converter of flexible packaging materials. Our process utilizes printing inks and coatings which contain volatile organic compounds or solvents. Our plan of compliance with this new press is to employ low solvent technology which is detailed in the EPA Guideline Series on Control of Volatile Organic Emissions from Existing Stationary Sources. Under Florida Rule 17-2, 17-2.650 we are a source of VOC, categorized as doing 3. Paper Coating and 16. Graphics Arts Systems.

This application is for a new flexographic press which replaces an older less efficient flexo press. This new press is designed and equipped with the most recent technology and hardware to enable us to use low solvent techniques as described in the EPA Guideline Series.



ARNOLD CELLOPHANE
DADE COUNTY FLORIDA

VICINITY MAP



- P-1 ; FLEXOGRAPHIC PRESS (EXISTING)
- P-2 ; " " " "
- P-4 ; " " " "
- P-3 ; FLEXOGRAPHIC & GRAVURE PRESS (EXISTING)

- L-2 ; TWO COATING HEAD ADHESIVE LAMINATOR, (SAME FOR L-3, L-5, L-6) "
- C-1 ; TWO STATION PVDC COATER (EXISTING)
- P-6 ; FLEXOGRAPHIC PRESS (NEW)

BEST AVAILABLE COPY

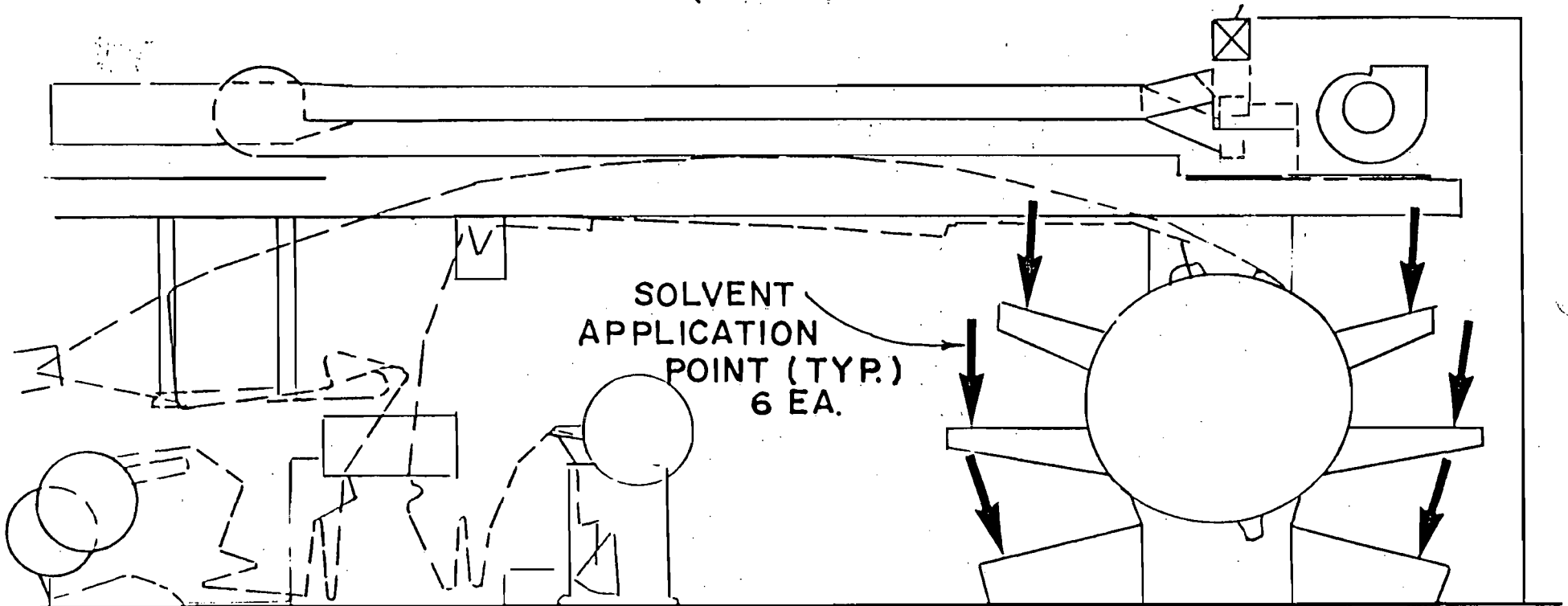
ARNOLD CELLOPHANE

DADE COUNTY FLORIDA

FLEXOGRAPHIC PRESS, P-4

SOLVENTS USED : ETHYL ALCOHOL
NORMAL PROPYL ALCOHOL

EXHAUST STACKS : (1) 12" x 18"
(1) 10" x 14"



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

IN TOWERS OFFICE BUILDING
5 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

June 17, 1982

Christopher C. Mayura
Arnold Cellophane Corporation
20400 S. W. 112th Avenue
Miami, Florida 33157

RE: Application to construct Air Pollution Source
(AC 13-55914) - New Flexographic Press

Dear Mr. Mayura:

The referenced application has been transferred to the Bureau of Air Quality Management (BAQM) for processing. BAQM is responsible for processing all construction permit applications for major air pollution sources in the state. DER Permit No. A013-50662, issued January 25, 1982 to your facility, limits the emissions from the facility to 1261.6 tons per year of Volatile Organic Compounds (VOC). A major source is defined as one which emits 100 tons per year or more of any regulated pollutant; therefore, your facility is defined as major.

VOCs, being chemical precursors in the formation of the criteria pollutant ozone, are regulated in those areas of Florida where the ambient air quality standard for ozone is exceeded (i.e., a Nonattainment Area) under Section 17-2.510 Florida Administrative Code (F.A.C.), New Source Review for Nonattainment Areas. A modified VOC source, under this section would be subject to this particular section only if proposed VOC emissions would increase by 40 tons per year, taking into account contemporaneous emissions changes.

Certain existing industries in Nonattainment Areas are required to apply additional controls under Section 17-2.650 Reasonably Available Control Technology (RACT). These regulations achieve emissions reductions through emissions limits or control technology for those categories of industry considered. A Flexographic Printer, which is the proposed source of the subject application, would be regulated under (1)(f)16. of this section, Graphic Art Systems, which calls

Christopher C. Mayura
(AC 13-55914)
Page Two

for either (1) 75% or more of the volatile fraction of the ink, by volume, to be water, or (2) 60% or more of the ink by volume to be nonvolatile material, or (3) incineration of at least 90% of the VOCs. Any newly installed flexographic printers would be subject to RACT as a minimum.

For the most part, the subject application is adequate, but in view of the two regulations outlined above, it is incomplete as submitted. The required information necessary to our office to continue processing of the application is listed below.

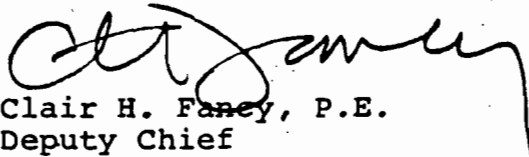
1. First of all, Section II - Part B gives June 1, 1982 as the date of Start of Construction. You must be aware that you are not allowed to begin construction until you have been issued a construction permit. Please correct this to reflect the time needed to issue the permit, which is no more than 90 days after the receipt by our office of a "complete" application.
2. In Section III - Part A, the application describes "Flexographic Inks" containing 40% by weight VOCs. Please list each ink to be used in the printer and the volume percentage of organic solvent, water, and solids in the inks, or information to verify standards. This must be the diluted composition "as it is applied to the substrate".
3. Section III - Part C: Emissions will be calculated directly from ink composition and utilization rates. Therefore we need to know the utilization rates of each ink to be used in both pounds per hour and tons per year.
4. In order to determine applicability to the New Source Review regulations mentioned earlier, we need to establish what the contemporaneous emissions changes are. These would include any emissions increases or decreases that have taken place within the five years prior to the submittal of the complete subject application or will occur before issuance of the proposed permit (e.g., the decrease affected through replacement of the existing flexographic press as referenced in the application - shutdown of this press would become a condition of the new permit if you wish to take credit for such an emissions decrease at this time). Please list all contemporaneous emissions increases or decreases that would apply in this case.
5. Any VOCs used for cleanup purposes must be accounted for. Please indicate the quantity of VOCs used for cleanup, if any, on an annual basis. A best estimate will suffice

Christopher C. Mayura
(AC 13-55914)
Page Three

for now, however all VOCs purchased that are not re-claimed will be considered as VOC emissions.

Processing of the application will continue once these questions are satisfied. Any information deemed proprietary will be held in the strictest of confidence upon your request. Please call myself or Tim Powell at (904)488-1344 if you have any questions.

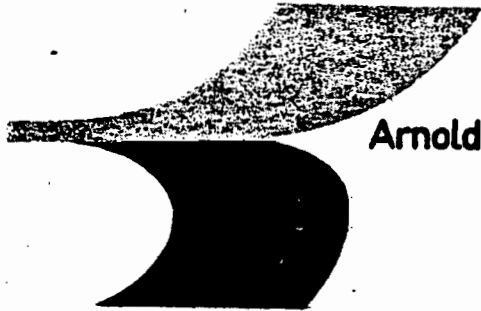
Sincerely,



Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CF/TP/ras

cc: D. M. Ambrose, P.E.
Jim Williams, DER - South Florida Subdistrict
Pat Wong, Dade County Environmental Resources
Management



Arnold Cellophane Corporation

20400 Southwest 112th Avenue, PO Box 570370
Miami, Florida 33157

Tim
JUL 10 1982

Telephone 305 238-5961 Telex 803360

July 13, 1982

Mr. Clair H. Fancy, P.E.
Department of Environmental Regulation
Twin Tower Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

Re: Application to Construct Air Pollution Source (ACT3-55914) - New Flexographic Press

The intent of this letter is to provide the additional information requested in your letter of June 17, 1982.

In order to complete our application, the following addendums are offered for this permit application.

- (1) Section II Part B - Please revise the date of start of construction to September 1, 1982.
- (2) Section III Part A - An extensive outline on inks and appropriate substrates to be printed is enclosed as Attachment A. Per your request all inks are identified by the supplier with trade name or formula numbers. They are LST compliance materials and conform to either a specification of; 25% (vol.) VOC, 75% water as in the volatile component, or 40% (vol.) VOC less water.

At present time we require our suppliers to verify the ink formulations are in compliance. Additional ink materials may be added to this list as they are made available.

Since the issuance of the Federal EPA Guidelines and Florida Law 17-2, November 1, 1981, we have been active in our search for LST inks that would comply with the law. We must point out that inks described as attached, must be proven to be equivalent in performance by our testing via a development program.

Directors: Julian R. Arnold (Pres.), William E. Brown, Jr., George Crichton,
John P. Duhig, Christopher C. Mazura (Chief Exec.), George W. Turner

Our ability to use LST inks depends on:

- (1) The availability of the ink and its performance.
- (2) The receptivity of the substrate being printed.
- (3) The design and capability of the printing press.

Better than 80% of the film substrates that we print are classified as oriented polypropylene films which are recognized in the trade as the most difficult to print. While some LST inks have reached commercial status on some films, the ink suppliers acknowledge that the products offered for oriented polypropylene are still in the experimental and developmental status with very limited commercial application.

When we requested our air pollution operating permit (A013-50662) we acknowledged that LST inks were developmental and that an extensive program would be required to prove the material performance.

A decision was made some time prior to this application to incorporate the state-of-the-art features in printing press design that would enhance our ability to use LST inks. This press which had been ordered some time prior to the November 1981 Law was intended to be a model and prototype which we hoped would lead to improvement in our other presses and ultimately result in compliance with the law.

The results of our testing and discussion with the ink suppliers has not been encouraging to date. In fact, we now anticipate that with the available material and technology applying BACT we will not be able to meet the compliance deadlines. We plan to have further discussion as to our problem with the Florida DER.

We must stress the importance of this new press. Should we be unable to operate it, the development and testing of LST inks could be set back further with the net effect of additional delays in meeting our air pollution objectives of reduced VOC emissions. We urgently need this permit to continue our development for LST inks because of the features of the new press.

- (3) Section III Part C - Utilization of inks for P6 must be estimated based on annual average consumption of the other press. The permit application states 33.6 lbs/hr. We would not be able to predict usage of each ink type or color or the actual final composition of the VOC, since the actual available compliance materials have yet to be selected or proven to be equivalent in performance.
- (4) With the addition of P-6, we do not anticipate any increase in VOC emission. Our ability to reduce emissions in part is contingent on our development program to utilize LST inks and coatings. The installation of this press is a key element in our successful development.

Mr. Clair H. Fancy

Page 3

July 13, 1982

- (5) All solvents used for cleanup are obtained by distillation of waste inks and coatings. The dirty washup solvent is re-cycled by distillation. We estimate that 25,000 gallons of solvent are re-cycled annually with better than 90% re-covered by distillation.

Sincerely,

ARNOLD CELLOPHANE CORPORATION



Kenneth H. Speckhals
Technical Manager

KHS:gh

cc: D.M. Ambrose
H. Patrick Wong
Jim Williams

7/13/82

ARNOLD CELLOPHANE ATTACHMENT A

INK TRADE NAME OR FORMULA NUMBER	INK TYPE (1)	INK USE	SUPPLIER	PRINTING SUBSTRATE (2)	COMMENTS
W78624, W101812	Water	Laminating	CONCO	Polypropylene	White Only
W101091, W110610	Water	Laminating	CONCO	Polyethylene, PVDC Coated Films, Cellophane	Limited Colors Available
W101239, W78264	Water	Laminating	CONCO	Polyester	No colors available
Hydroflex	Water	Surface Print	CONCO	Glassine, Paper	Colors available
W101712, W18926	Water	Surface Print	CONCO	Polyethylene	Limited colors available
LX796	Water	Surface Print	CONCO	Polypropylene, Coated PP	White Only
P70664	High Solids	Surface Print	CONCO	Polyethylene, Polypropylene coated film	Color available
EZ Lam White	High Solids	Laminating	CONCO	Polyethylene, Polypropylene	White Only
84-3-55539	Water	Laminating	CRODA	Polyethylene, Polyester	Limited Colors available
84-3-55543	Water	Laminating	CRODA	Coated Films, Cellophane	Limited colors available
84-3-55537	Water	Surface Print	CRODA	Polyethylene, Polypropylene	Limited colors available
84-3-55541	Water	Surface Print	CRODA	Coated Films, Cellophane	Limited Colors available
84-3-55545	High Solids	Surface Print	CRODA	Polyethylene, Polypropylene	Colors Available
84-3-95547	High Solids	Surface Print (Catalyzed)	CRODA	All Films, except polyethylene	Limited colors available
329-01400	Water	Sealable Coating	CRODA	Coated Films, Cellophane	-

7/13/82

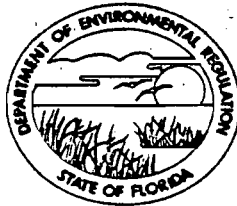
INK TRADE NAME OR FORMULA	INK TYPE (1)	INK USE	SUPPLIER	PRINTING SUBSTRATE	COMMENTS
82-3-90017	Water	Overprint Lacquer	CRODA	Polypropylene, polyethylene Coated films	-
Aqua Bond PP	Water	Laminating	INMONT	Polypropylene	Limited colors
Aqua Bond PE	Water	Laminating	INMONT	Polyethylene	Limited Colors
Aqua Bond S	Water	Laminating	INMONT	Coated Films, Cellophane	Limited Colors
Aqua Bond M	Water	Laminating	INMONT	Polyester	Colors Available
Aqua Film PE	Water	Surface Print	INMONT	Polyethylene	Colors Available
Aqua Film PP	Water	Surface Printing	INMONT	Polypropylene	Colors Available
Aqua Film S	Water	Surface Printing	INMONT	Coated Films, Cellophane	Colors Available
Aqua Film M	Water	Surface Printing	INMONT	Polyester	Colors Available
Aqua Glass	Water	Surface Printing	INMONT	Glassine	Colors Available
Aquaphane	Water	Over printlacquer	INMONT	All Films	Colors Available
F89060	High Solids	Surface Printing	INMONT	All Films	Colors Available
Hydropoly	Water	Surface Printing Laminating	GPI	Polyethylene	Limited Colors Available
S-81-1336	Water	Surface Printing Laminating	GPI	Polyester, Cellophane Polyethylene, polypropy- lene, coated films	White only
Hydrofast	Water	Surface Printing	GPI	Glassine, Paper	Colors, available
Ultra Opaque Sunsheen	High Solid	Surface Print	GPI	All Films and Papers	Limited Colors
S-79-0138	Water	Overprint Lacquer	GPI	Coated Films	-

FOOTNOTES

7/13/82

- (1) Water inks are 75% Water/25% VOC or less by definition, high solid inks are 40% volume VOC/60% solids or greater excluding water.
- (2) The description of the printed substrates is generic. There are many different types, classifications and grades of each generic substrate some of which may require different ink formulations. All ink suppliers emphasize that the LST inks and their proposed use may be severely limited depending on the end use, the substrate being printed and the printing press available. Many of the inks listed have not reached commercial status.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

November 4, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Christopher C. Mazura
Chief Executive Officer
Arnold Cellophane Corporation
20400 S.W. 112th Avenue
Miami, Florida 33157

Dear Mr. Mazura:

Enclosed is Permit Number AC 13-55914, dated November 2, 1982
to Arnold Cellophane Corporation
issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

for Lawrence A. George
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

cc: D. M. Ambrose, P.E., D. M. Ambrose Associates, Inc.
Jim Williams, DER Southeast Florida District
Pat Wong, Dade County Environmental Resources Mgmt.

Arnold Cellophane Corporation

Flexographic Press

Dade County

The construction application has been reviewed by the Department. Public notice of the Department's intent to issue was published in the Miami Herald on September 2, 1982. The preliminary determination and technical evaluation were available for public inspection at the Dade County Environmental Resources Management, the DER South Florida Subdistrict (now the DER Southeast Florida District) and the Bureau of Air Quality Management.

Comments were received from Mr. Rafael Rodon, Chief of the Environmental Planning Division, Dade County Environmental Resources Management. Mr. Rodon indicated that Arnold Cellophane does not presently employ low solvent technology (LST) and will be unable to do so by the date of expiration of this particular construction permit. The applicant had selected the LST instead of installing an incinerator (RACT standard options: either/or). Therefore, the Bureau accepts the comments and the following revisions will be incorporated in the final determination and shall read:

Specific Conditions:

1. The owner or operator of this Flexographic Press (P-6), which will employ solvent containing ink, shall not cause, allow or permit the operation of the unit unless:
 - a. The volatile fraction of ink 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, contains 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.

4. Compliance with the RACT standards stated in Specific Condition #1 shall be verified annually (permit anniversary date) by the owner/operator and in accordance with the following:

a. Option 1.a. or 1.b. - EPA Method 24, Appendix A, 40 CFR 60; or

b. Option 1.c. - EPA Method 25, Appendix A, 40 CFR 60.

The annual compliance report (Option 1.a. or 1.b.)/test (Option 1.c.) shall be submitted to the DER Southeast Florida District Office or its designee. If Option 1.a. or 1.b. was selected, the report shall be submitted 15 days after the permit anniversary date. If Option 1.c. was selected, the test shall be conducted by the permit anniversary date and the test report shall be submitted 15 days after the date of the test.

Attachment is as follows:

4. Mr. Rafael Rodon's letter, with an attachment, dated October 5, 1982.

It is recommended that the construction permit be issued as drafted, with the above revisions and attachment incorporated.

ATTACHMENT 4

METROPOLITAN DADE COUNTY, FLORIDA



ENVIRONMENTAL RESOURCES MANAGEMENT

909 S.E. FIRST AVENUE
BRICKELL PLAZA BUILDING—RM. 402
MIAMI, FLORIDA 33131
(305) 579-2760

October 5, 1982

Mr. Clair Fancy, P.E.
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
OCT 11 1982
BAQMI

Re: Arnold Cellophane Corporation Ap-
plication for a Permit to Construct
a New Flexographic Printing Press

Dear Mr. Fancy:

Pursuant to our telephone conversation of September 9th, 1982, during which I advised that Arnold Cellophane does not presently employ low solvent technology (LST) as stated in the project description attached to your notice of intent to issue a permit, I visited the subject facility to determine the status of same.

I spoke with Mr. Kenneth Speckhals at Arnold Cellophane who confirmed that LST definitely will not be in place for the existing plant by the compliance deadlines stated in DER Permit No. AO 13-50662. Mr. Speckhals had indicated this earlier in his letter to you of July 13, 1982, of which an additional copy is attached herewith. He further advised that development of low solvent inks for their operation continues to be uncertain.

In view of all the later developments, the Department of Environmental Resources Management hereby withdraws its earlier approval of June 3, 1982 for the new press, as it would further exacerbate the situation anticipated by Arnold Cellophane's non-compliance after December 31, 1982.

Furthermore, DERM does not feel any further permitting is justified unless Arnold Cellophane proposes control measures for the V.O.C. emissions from their entire facility, with definite dates for implementation agreeable to all parties concerned. It would appear at this time that low solvent technology is not a viable approach, so alternate controls might need to be applied.

If you should have any questions on the above, please advise.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Rafael Rodon'.

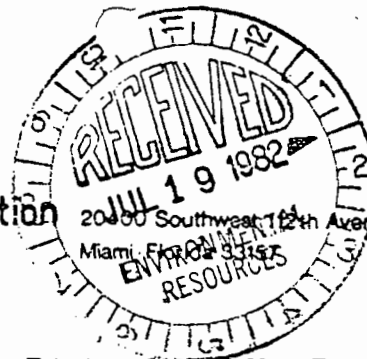
Rafael Rodon, Chief
Environmental Planning Division

RR:HPW:ag

CC: J. Stilwell
K. Speckhals

ATTACHMENT

Arnold Cellophane Corporation



2600 Southwest 12th Avenue · PO Box 570370

Miami, Florida 33135

Telephone 305 238-5961 Telex 803360

July 13, 1982

Mr. Clair H. Fancy, P.E.
Department of Environmental Regulation
Twin Tower Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

Re: Application to Construct Air Pollution Source (AC13-55914) - New Flexographic Press

The intent of this letter is to provide the additional information requested in your letter of June 17, 1982.

In order to complete our application, the following addendums are offered for this permit application.

- (1) Section II Part B - Please revise the date of start of construction to September 1, 1982.
- (2) Section III Part A- An extensive outline on inks and appropriate substrates to be printed is enclosed as Attachment A. Per your request all inks are identified by the supplier with trade name or formula numbers. They are LST compliance materials and conform to either a specification of; 25% (vol.) VOC, 75% water as in the volatile component, or 40% (vol.) VOC less water.

At present time we require our suppliers to verify the ink formulations are in compliance. Additional ink materials may be added to this list as they are made available.

Since the issuance of the Federal EPA Guidelines and Florida Law 17-2, November 1, 1981, we have been active in our search for LST inks that would comply with the law. We must point out that inks described as attached, must be proven to be equivalent in performance by our testing via a development program.

Mr. Clair H. Fancy

Page 2

July 13, 1982

Our ability to use LST inks depends on:

- (1) The availability of the ink and its performance.
- (2) The receptivity of the substrate being printed.
- (3) The design and capability of the printing press.

Better than 80% of the film substrates that we print are classified as oriented polypropylene films which are recognized in the trade as the most difficult to print. While some LST inks have reached commercial status on some films, the ink suppliers acknowledge that the products offered for oriented polypropylene are still in the experimental and developmental status with very limited commercial application.

When we requested our air pollution operating permit (A013-50662) we acknowledged that LST inks were developmental and that an extensive program would be required to prove the material performance.

A decision was made some time prior to this application to incorporate the state-of-the-art features in printing press design that would enhance our ability to use LST inks. This press which had been ordered some time prior to the November 1981 Law was intended to be a model and prototype which we hoped would lead to improvement in our other presses and ultimately result in compliance with the law.

The results of our testing and discussion with the ink suppliers has not been encouraging to date. In fact, we now anticipate that with the available material and technology applying BACT we will not be able to meet the compliance deadlines. We plan to have further discussion as to our problem with the Florida DER.

We must stress the importance of this new press. Should we be unable to operate it, the development and testing of LST inks could be set back further with the net effect of additional delays in meeting our air pollution objectives of reduced VOC emissions. We urgently need this permit to continue our development for LST inks because of the features of the new press.

- (3) Section III Part C - Utilization of inks for P6 must be estimated based on annual average consumption of the other press. The permit application states 33.6 lbs/hr. We would not be able to predict usage of each ink type or color or the actual final composition of the VOC, since the actual available compliance materials have yet to be selected or proven to be equivalent in performance.
- (4) With the addition of P-6, we do not anticipate any increase in VOC emission. Our ability to reduce emissions in part is contingent on our development program to utilize LST inks and coatings. The installation of this press is a key element in our successful development.

Mr. Clair H. Fancy

Page 3

July 13, 1982

- (5) All solvents used for cleanup are obtained by distillation of waste inks and coatings. The dirty washup solvent is re-cycled by distillation. We estimate that 25,000 gallons of solvent are re-cycled annually with better than 90% re-covered by distillation.

Sincerely,

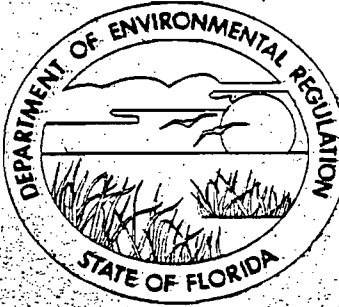
ARNOLD CELLOPHANE CORPORATION



Kenneth H. Speckhals
Technical Manager

KHS:gh

cc: D.M. Ambrose
~~H. Patrick Wong~~
Jim Williams



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 13-55914

ARNOLD CELLOPHANE CORPORATION
20400 S. W. 112TH AVENUE
MIAMI, FLORIDA 33157

DATE OF ISSUANCE

November 2,
OCTOBER 6, 1982

DATE OF EXPIRATION

FEBRUARY 28, 1983

Victoria J. Tschinkel

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: Arnold Cellophane Corporation
20400 S. W. 112th Avenue
Miami, Florida 33157

PERMIT/CERTIFICATION
NO. AC 13-55914

COUNTY: Dade

PROJECT: Flexographic
Press (P-6)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above-named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a Flexographic Press (P-6) and associated VOC pollutant control measures for the manufacture of flexible packaging materials. Solvent content of inks used will be in accordance with the RACT standard contained in 17-2.650(1)(f)16., FAC.

Attachments:

1. Application to Construct Air Pollution Sources, DER form 17-1.122(16).
2. Letter of Incompleteness from Clair Fancy, dated June 17, 1982.
3. Response to Incompleteness letter from Kenneth Speckhals, dated July 13, 1982.
4. Mr. Rafael Rodon's letter, with an attachment, dated October 5, 1982.

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. 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.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

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)

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SPECIFIC CONDITIONS:

1. The owner or operator of this Flexographic Press (P-6), which will employ solvent containing ink, shall not cause, allow or permit the operation of the unit unless:
 - a. The volatile fraction of ink 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, contains 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.
2. Records shall be kept of the amounts of inks, coatings, and solvents (including those used for cleanup) purchased for all operations permitted at the plant. Information necessary to verify compliance with the RACT standards, including certified analyses of ink and coating solvent content by the supplier, is also required in the records. The records shall be made available to the Department or its designee upon request.
3. The hours of operation for the Press P-6 shall not exceed 24 hours per day, 5 days per week, and 52 weeks per year, or 6240 hours per year.
4. Compliance with the RACT standards stated in Specific Condition #1 shall be verified annually (permit anniversary date) by the owner/operator and in accordance with the following:
 - a. Option 1.a. or 1.b. - EPA Method 24, Appendix A, 40 CFR 60; or
 - b. Option 1.c. - EPA Method 25, Appendix A, 40 CFR 60.

The annual compliance report (Option 1.a. or 1.b.)/test (Option 1.c.) shall be submitted to the DER Southeast Florida District Office or its designee. If Option 1.a. or 1.b. was selected, the report shall be submitted 15 days after the permit anniversary date. If Option 1.c. was selected, the test shall be conducted by the permit anniversary date and the test report shall be submitted 15 days after the date of the test.

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5. Prior to 90 days before the expiration of this permit, the applicant will demonstrate compliance with the conditions of this construction permit and a complete application for an operating permit shall be submitted to the Department or its designee. Full operation of the source may then be conducted in compliance with the terms of this permit until expiration of this permit or receipt of an operating permit.

Expiration Date: February 28, 1983

Issued this 2 day of November, 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

 Pages Attached.

Victoria J. Hendell
Signature

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