

P 408 530 592

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Robert E. Kindorf	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 12/12/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Mr. Robert E. Kindorf
Spiralkote, Inc.
1200 Central Fla. Parkway
Orlando, FL 32809

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number P 408 530 592
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Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

6. Signature - Agent
X *Arnell Colby*

7. Date of Delivery
12-12-86

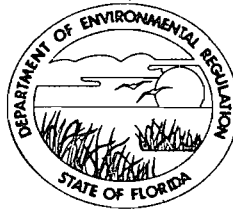
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

File Copy

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Robert E. Kindorf
Vice President
Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

December 12, 1986

Enclosed is Permit Number AC 48-124247 to Spiralkote, Inc. which authorizes the construction of a solvent recovery still system in Orlando, Orange County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

Jerome Guidry, P.E.
Tom Sawicki

copied: T. Sawicki 7/20/87 am

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on Dec. 12, 1986 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams 12/12/86
Clerk Date

Final Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Permit Number:
AC 48-124247

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

December 11, 1986

Final Determination
Spiralkote, Inc.: AC 48-124247
Orange County

The construction permit application and attachments have been reviewed by the department. Public notice of the department's intent to issue was published in The Orlando Sentinel issue of November 19, 1986. The technical evaluation and preliminary determination were available for public inspection at the DER's Central Florida District office and Bureau of Air Quality Management office.

There were no comments received. Therefore, it is recommended that the construction permit be issued as drafted.

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

PERMITTEE:
Spiralkote, Inc.
1200 Central Fla. Parkway
Orlando, Florida 32809

Permit Number: AC 48-124247
Expiration Date: April 30, 1987
County: Orange
Latitude/Longitude: 28° 24' 21"N.
81° 23' 40"W/
Project: Solvent Recovery Still System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a Recyclene RX-35 Solvent Recovery System (SRS) at the permittee's existing facility located at the above address. The SRS will process 120 gallons of waste solvent mixture (75% perchloroethylene and 25% n-butyl alcohol) per day, reclaiming 95% (114 gals/day) as clean solvent, 4% (4.8 gals/day) of still bottom (sludge) will be shipped to a hazardous waste landfill, and the remaining 1% (1.2 gals/day) will be released by a pressurized pop off valve through a breather vent of the rear of the unit into the immediate surroundings and will be eventually removed by the facility's ventilation system. The projected annual through-put is 30,000 gallons of contaminated solvents, which are volatile organic compounds. The new SRS will replace an existing solvent recovery still system (AC 48-82738).

The standard industrial codes for the source are: Major Group 27-Printing/Publishing; Group No. 275-Commercial Printing; Industrial No. 2751-Commercial Printing, Letterpress and Screen.

The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The source shall be as reflected in the permit application, plans, documents, drawings, and amendments, except as otherwise noted in the Specific Conditions.

Attachments:

1. Application to Construct/Modify Air Pollution Sources, DER Form 17-2.202(1), received August 18, 1986, with Jerome J. Guidry's cover letter dated August 15, 1986.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

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 Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement 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 applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. 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. This permit does not constitute 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 the permit.

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

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, 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, unless specifically authorized by an order from the department.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

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

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.
- () Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. Operation shall not exceed 24 hours/day, 500 hours/month, and 6000 hours annually.
2. Maximum through-put rate of waste solvent mixture (75% perchloroethylene and 25% n-butyl alcohol) shall not exceed 120 gals/day, 2500 gals/month and 30,000 gals/year.
3. Maximum allowable VOC (volatile organic compounds) emissions shall not exceed 0.6 lbs/hr, 14.4 lbs/day, 300 lbs/month, and 1.8 tons/year.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

4. In accordance with FAC Rule 17-2.620(a), objectionable odors shall not be allowed off plant property.
5. In accordance with FAC Rule 17-2.240, no person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
6. The projected reclaiming/recovery efficiency of the solvent recovery system is 95% and shall be verified using a material balance scheme.
7. An annual operating report (AOR) shall account for the VOC through-put and emissions on a monthly basis, verifiable on a 24-hour basis. The AOR is to be submitted to the DER's Central Florida District office no later than March 1 of each calendar year, which will account for the previous year's VOC through-put and emissions. Cleaning solvents shall be accounted for and included in the AOR.
8. The existing solvent recovery still (AC 48-82738) will be removed from service after debugging and placing the new solvent recovery system into service. All applicable sections of AC 48-82738 for the existing solvent recovery still shall then be surrendered to the Department and will no longer be valid.
9. 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 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Central Florida District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

PERMITTEE:
Spiralkote, Inc.

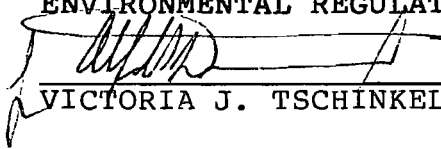
Permit Number: AC 48-124247
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this 12 day of Dec, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
FROM: _____ DATE: _____

TO: Victoria J. Tschinkel
FROM: Clair Fancy *Clair Fancy*
DATE: December 11, 1986
SUBJ: Approval of Air Construction Permit

Attached for your approval and signature is one air construction permit to Spiralkote, Inc. to construct solvent recovery still system at the applicant's facility in Orlando, Orange County, Florida.

Day 90, after which the permit would be issued by default, is January 27, 1987.

The Bureau recommends your approval and signature.

CF/pa

Attachment

RECEIVED
DEC 11 1986
Office of the Secretary

Check Sheet

Company Name: Spiralboto, Inc
Permit Number: AC 48-124247
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

- AC 48-82739
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 25, 1987

Mr. Robert E. Kindorf
Vice President
Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

Dear Mr. Kindorf:

Re: Expiration Date Extension for the Construction Permit:
AC 48-124247.

The department is in receipt of Mr. Jerome J. Guidry's letter dated March 18, 1987, which requested an extension of the expiration date for the above referenced permit. The following shall be changed and added:

Expiration Date:

From: April 30, 1987
To: July 31, 1987

Attachment to be Incorporated:

2. Mr. Jerome J. Guidry's letter dated March 18, 1987 and received March 20, 1987.

This letter must be attached to your construction permit No. AC 48-124247 and shall become a part of the permit.

Sincerely,

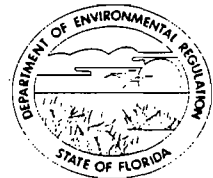
Dale Twachtmann
Dale Twachtmann
Secretary

DT/ks

cc: T. Sawicki
J. Costas, Esq.
J. Guidry

copied: T. Sawicki 7/20/87 am

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
FROM: _____ DATE: _____

TO: Dale Twachtmann
THRU: Howard L. Rhodes *HR*
FROM: C. H. Fancy *CHF*
DATE: March 25, 1987
SUBJ: Approval and Signature of an Amendment to Construction Permit No. AC 48-124247, for Spiralkote, Inc., Issued December 12, 1986.

Enclosed is an amendment to the referenced construction permit and the bureau recommends approval.

CHF/BM/s



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

889 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801-1088
305/423-7275

PM [CM- P-609-605-458]
3-18-87
Orlando, FL

DER

MAR 20 1987

BAQM

March 18, 1987

Mr. A. T. Sawicki, P.E.
Florida Department of Environmental Regulation
3319 Maguire Blvd., Suite 232
Orlando, FL 32801

RE: Spiralkote Solvent Recovery Still
Permit No. AC48-124247

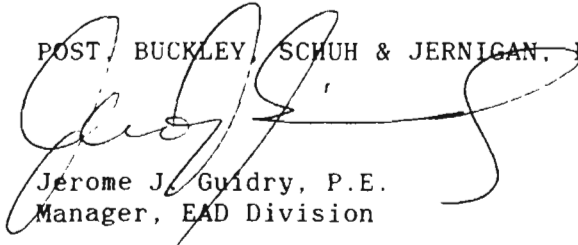
Dear Mr. Sawicki:

We are requesting a three-month extension on the expiration date on the above referenced construction permit. Please change the expiration date to July 30, 1987.

If you have any questions, call me at 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.



Jerome J. Guidry, P.E.
Manager, EAD Division

JJG:daa

cc: Bruce Mitchell
Robert Kindorf

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

DER

ADVERTISING CHARGE \$92.27

State of Florida)
COUNTY OF ORANGE)

NOV 24 1986

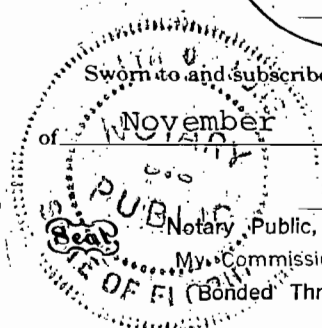
BAQM

Before the undersigned authority personally appeared
Catherine Deering

_____ , who on oath says that
she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper
published at Orlando, in Orange County, Florida; that the attached copy of ad-
vertisement, being a Notice of Intent _____ in the matter of
Permit to Spiralkote, Inc. _____

_____ in the _____ Court,
was published in said newspaper in the issues of _____
November 19, 1986

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in
said Orange County, Florida, and that the said newspaper has heretofore been continuously
published in said Orange County, Florida, each Week Day and has been entered as second-
class mail matter at the post office in Orlando, in said Orange County, Florida for a period of
one year next preceding the first publication of the attached copy of advertisement; and af-
fiant further says that he/she has neither paid nor promised any person, firm or corporation
any discount, rebate, commission or refund for the purpose of securing this advertisement for
publication in the said newspaper.



Sworn to and subscribed before me this _____ 20th _____ day
of _____ November _____ A.D. 19 86

Rita C. Luke
Notary Public

FORM NO. AD-262

State of Florida
Department of
Environmental Regulation
Notice of Intent
The Department gives notice
of its intent to issue a permit
Spiralkote, Inc. to replace an
existing solvent recovery still
system with a new solvent re-
covery system at the appli-
cant's facility in Orlando, Or-
ange County, Florida. A deter-
mination of best available con-
trol technology (BACT) was not
required.
Persons whose substantial
interests are affected by the
Department's proposed permit-
ting decision may petition for
an administrative determination
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
Chapters 17-103 and 28-5,
Florida Administrative Code,
and must be filed (received) in
the Department's Office of
General Counsel, 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, Flor-
ida 32301, within fourteen (14)
days of publication of this no-
tice. Failure to file a petition
within this time period consti-
tutes a waiver of any right such
person has to request an ad-
ministrative determination
(hearing) under Section
120.57, Florida Statutes.
If a petition is filed, the ad-
ministrative hearing process is
designed to formulate agency
action. Accordingly, the De-
partment's final action may be
different from the proposed
agency action. Therefore, per-
sons who may not wish to file a
petition may wish to intervene
in the proceeding. A petition
for intervention must be filed
pursuant to Rule 28-5.207,
Florida Administrative Code, at
least five (5) days before the fi-
nal hearing and be filed with
the hearing officer if one has
been assigned at the Division
of Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32301. If no
hearing officer has been as-
signed, the petition is to be
filed with the Department's Of-
fice of General Counsel, 2600
Blair Stone Road, Tallahassee,
Florida 32301. Failure to peti-
tion to intervene within the al-
lowed time frame constitutes a
waiver of any right such person
has to request a hearing under
Section 120.57, Florida

Statutes.
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32399-
2400
Dept. of Environmental
Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Any person may send written
comments on the proposed ac-
tion to Mr. Bill Thomas at the
department's Tallahassee ad-
dress. All comments mailed
within 14 days of the publica-
tion of this notice will be con-
sidered in the department's fi-
nal determination.
CL-184 Nov. 19, 1986

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

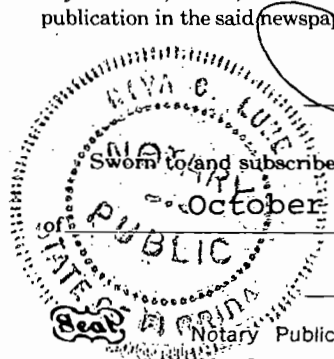
State of Florida)
COUNTY OF ORANGE) SS.

Before the undersigned authority personally appeared
Catherine Deering

_____ who on _____ says that
she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper
published at Orlando, in Orange County, Florida; that the attached copy of ad-
vertisement, being a Notice of Intent in the matter of
Permit to Spiralkote, Inc.

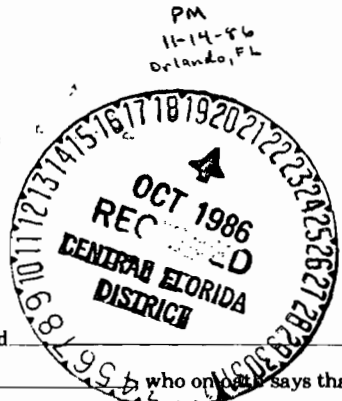
_____ in the _____ Court,
was published in said newspaper in the issues of _____
October 16, 1986

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando, in said Orange County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Notary Public, State of Florida at Large
My Commission Expires July 31, 1990
Bonded Thru Brown & Brown, Inc.

[Signature]
_____ 16th _____ day
A.D., 19 86
[Signature]
Notary Public



ADVERTISING CHARGE \$65.72

State of Florida Department of Environmental Regulation Notice of Intent

The Department gives notice of its intent to issue a permit Spiralkote, Inc. to replace an existing solvent recovery still system with a new solvent recovery system at the applicant's facility in Orlando, Orange County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 26-8, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.
CL-990 Oct.16.1986

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

~~to~~ Bruce Mitchell

INITIAL

DATE

2.

Bureau of Air Quality Manag-

INITIAL

DATE

3. Department of Environmental Regulations
Twin Towers Office Building

INITIAL

DATE

4. 2600 Blair Stone Road
Tallahassee, FL 32399-2400

INITIAL

DATE

REMARKS:

*will
re-publish*

DER

NOV 17 1986

BAQM

11-17-86 @ 2:10 PM

Called Bruce Ferraro (consultant) and told him that the notice did not contain the 2nd page. Requested that they go back out on notice and had him change the 30 to a 14 day notice requirement contained in the last Paragraph on the 2nd page.

BFB

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

John

DATE

11-14-86

PHONE

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Mr. Robert E. Kindorf
 Spiralkote, Inc.
 1200 Central Florida Parkway
 Orlando, Florida 32809

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 532 051

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee.
 X *[Signature]*

6. Signature - Agent
 X *[Signature]*

7. Date of Delivery
 X *10/9/86*

8. Addressee's Address (ONLY if requested and fee paid)

P 408 532 051

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

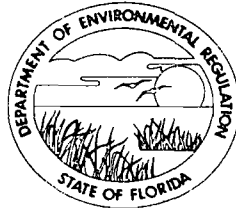
(See Reverse)

Sent to Mr. Robert E. Kindorf	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
10/6/86	

PS Form 3800, Feb. 1982

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

October 6, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Robert E. Kindorf
Vice President
Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

Dear Mr. Kindorf:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a new solvent recovery system at your existing facility in Orlando, Orange County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

Barry D. Andrews for C.H. Fancy

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

CHF/pa

Attachments

cc: Jerome Guidry, P.E.
T. Sawicki

1

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit Spiralkote, Inc. to replace an existing solvent recovery still system with a new solvent recovery system at the applicant's facility in Orlando, Orange County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

DER File No. AC 48-124247

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Spiralkote, Inc., applied on August 18, 1986, to DER for a permit to replace an existing solvent recovery with a new solvent recovery system at the applicant's facility in Orlando, Orange County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Barry D. Anderson for C. H. Fancy

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

Copies furnished to:

Robert E. Kindorf
Jerome J. Guidry, P.E.
T. Sawicki

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on October 6, 1986.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams October 6, 1986
Clerk Date

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.

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit. Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications. To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

Technical Evaluation
and
Preliminary Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Construction Permit No:
AC 48-124247

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

October 6, 1986

I. Project Information

A. Applicant

Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

B. Project Description

The applicant proposes to replace an existing solvent recovery still (SRS) with a new SRS. The existing SRS was permitted to emit a maximum of 21.2 TPY of volatile organic compounds (VOC). The potential VOC emissions for the proposed new SRS are 1.8 TPY. The projected VOC recovery efficiency is 95%. The VOC mixture to be reclaimed consists of n-butyl alcohol (25%) and perchloroethylene (75%).

The standard industrial codes for the source are: Major Group 27-Printing/Publishing; Group No. 275-Commercial Printing; Industrial No. 2751-Commercial Printing, Letterpress and Screen.

The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

C. Process and Controls

Spent solvent (VOC) from the Cyrel plate room operation will be reclaimed in a Recyclene RX-35 Solvent Recovery System (SRS). The SRS will reclaim a mixture of n-butyl alcohol and perchloroethylene by distillation. The SRS will process 120 gallons of waste solvent per day, reclaiming 95% (114 gallons) as clean solvent.

As proposed, the SRS will be a closed system. Any VOC emissions will be released by a pressurized pop off valve through a breather vent on the rear of the unit into the immediate surroundings and will eventually be removed by the facility's ventilation system. Less than one percent (1.2 lbs/day) of the waste solvent through-put is assumed to be discharged as VOC emissions. The remaining 4% (4.8 lbs/day) is still bottom (sludge) and will be shipped to a hazardous waste landfill.

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4.

The application package was received by the department on August 18, 1986, and deemed complete on August 27, 1986.

The existing facility is located in Orange County, which is an area designated nonattainment for the pollutant ozone pursuant to FAC Rule 17-2.410(1)(b). The existing facility is a major facility for volatile organic compounds (VOC), which are defined pursuant to FAC Rules 17-2.100(110) and 17-2.100(209), respectively. VOC are considered precursors to ozone.

Other pollutants emitted from the facility are nitrogen oxides (NOx), sulfur dioxide, carbon monoxide, particulate matter and hydrocarbons as a result of the combustion of natural gas. With exception of NOx, the total facility's projected potential emissions of each pollutant is less than 0.5 TPY and considered insignificant. The total facility's projected potential NOx emissions are 1.5 TPY and also considered insignificant.

The projected potential VOC emissions associated with the Recyclene RX-35 Solvent Recovery System (SRS) are exhibited in the following table:

Table 1	
Potential VOC Emissions (TPY)	
New SRS System	1.8

Note:

- o Based on 6000 hrs/yr operation
- o Maximum distillation of 120 gals/day of a contaminated mixture of 75% Perchloroethylene and 25% n-Butyl Alcohol
- o Projected pure mixture recovery efficiency of 95% (114 gals/day), 1% discharge (1.2 gals/day), and 4% still bottom (sludge; 4.8 gals/day)

The contemporaneous VOC emissions decrease associated with the existing solvent recovery still is exhibited in the following table:

Table 2	
Contemporaneous VOC Emissions (TPY)	
Existing SRS System	-21.2

Note:

- o Based on 6000 hrs/yr operation
- o Maximum distillation of 55 gals/day of a contaminated mixture of 75% Perchloroethylene and 25% n-Butyl Alcohol
- o Projected pure mixture recovery efficiency of 65% (35.75 gals/day), 26% discharge (14.25 gals/day), and 9% still bottom (sludge; 5 gals/day).

The following table will exhibit the net VOC potential emissions associated with the proposed project:

Table 3

Net VOC Potential Emissions (TPY)	
New SRS System	1.8
Existing SRS System	-21.2
Total:	-19.4

Based on Table 3, the proposed new SRS system's VOC potential emissions are not subject to review pursuant to FAC Rule 17-2.510, New Source Review for Nonattainment Areas pursuant to FAC Rule 17-2.510(2)(d)4.a. Therefore, the proposed source's VOC potential emissions are subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

Since there is not a specific emission limiting and performance standard for the proposed source contained in FAC Rules 17-2.600, 17-2.650 and 17-2.660, the proposed new SRS will be permitted in accordance with FAC Rule 17-2.620, General Pollutant Emission Limiting Standards.

In accordance with FAC Rule 17-2.620(1)(a), VOC Emissions or Organic Solvent Emissions, no person shall store, pump, handle, process, load, unload or use in any process or installation VOC or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The applicant proposes to collect and recover 95% of the contaminated mixture solvents (VOC) being distilled and this recovery efficiency was used to project the VOC potential emissions. The department accepts the applicant's proposal and will use it to establish the allowable VOC emissions limits.

In accordance with FAC Rule 17-2.620(a), Objectionable Odors, no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. Consequently, no objectionable odors shall be allowed off plant property.

In accordance with FAC Rule 17-2.240, Circumvention, no person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

A material balance scheme is an acceptable methodology for accounting for VOC emissions from the proposed new SRS system. Accounting shall be maintained monthly, verifiable on a 24-hour basis, and included in the annual operating report (AOR). The annual VOC emissions shall be submitted in the AOR no later than March 1 of each calendar year and is to be sent to the DER's Central Florida District office. Cleaning solvents shall be accounted for and included in the AOR.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the proposed new SRS system are VOC. The following table will reflect the maximum allowable VOC emissions from the facility:

Table 4

Source	Maximum Allowable VOC Emissions		
	lbs/hr	lbs/mth	TPY
Cyrel Plate Room: Recyclene RX-35 Solvent Recovery Still System	0.6	300	1.8

- Note:
- o Operations based on 24 hrs/day, 500 hrs/mth, and 6000 hrs/yr.
 - o Maximum distillation of 120 gals/day of a contaminated mixture of 75% Perchloroethylene and 25% n-Butyl Alcohol
 - o Projected pure mixture recovery efficiency of 95% (114 gals/day), 1% discharge (1.2 gals/day), and 4% still bottom (sludge; 4.8 gals/day).

The permitted emissions are in compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

B. Air Quality Analysis

From a technical review of the application and attachments, an air quality analysis was not required for the proposed new SRS system. The proposed project will not interfere with reasonable further progress toward attaining the ambient air quality standards. In fact, the net VOC emissions change is negative due to the removal of an existing SRS system having less VOC recovery efficiency.

IV. Conclusion

The permitted VOC emissions from the proposed new SRS system should not cause any violation of Florida's ambient air quality standards. With the addition of the new SRS system and the removal of the existing one, the total facility's permitted VOC emissions become 132.5 TPY, which includes 6.7 TPY of clean-up solvents. Therefore, 82.9 tons (approximately 9.5%) of the Orange County's allotted VOC new source allowance (NSA) will be assigned to this facility (49.6 TPY assigned to Kidder I, which does not count against the NSA).

With the previous facility's modifications attaining a total net VOC potential emissions change of +19.3 TPY and a net VOC potential emissions change of -19.4 TPY associated with the

proposed project, the net result is zero as far as VOC potential emissions tracking goes for the facility pursuant to new source review requirements and significant net emissions increase. Therefore, a significant net emissions increase of 40 TPY in VOC potential emissions pursuant to Table 500-2, FAC Rule 17-2, will have to occur at the facility before requiring review in accordance with FAC Rule 17-2.510(4), Preconstruction Review Requirements.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all applicable requirements of FAC Rules 17-2 and 17-4.

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

PERMITTEE:
Spiralkote, Inc.
1200 Central Fla. Parkway
Orlando, Florida 32809

Permit Number: AC 48-124247
Expiration Date: April 30, 1987
County: Orange
Latitude/Longitude: 28° 24' 21"N
81° 23' 40"W/
Project: Solvent Recovery Still System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a Recyclene RX-35 Solvent Recovery System (SRS) at the permittee's existing facility located at the above address. The SRS will process 120 gallons of waste solvent mixture (75% perchloroethylene and 25% n-butyl alcohol) per day, reclaiming 95% (114 gals/day) as clean solvent, 4% (4.8 gals/day) of still bottom (sludge) will be shipped to a hazardous waste landfill, and the remaining 1% (1.2 gals/day) will be released by a pressurized pop off valve through a breather vent of the rear of the unit into the immediate surroundings and will be eventually removed by the facility's ventilation system. The projected annual through-put is 30,000 gallons of contaminated solvents, which are volatile organic compounds. The new SRS will replace an existing solvent recovery still system (AC 48-82738.D.)

The standard industrial codes for the source are: Major Group 27-Printing/Publishing; Group No. 275-Commercial Printing; Industrial No. 2751-Commercial Printing, Letterpress and Screen.

The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The source shall be as reflected in the permit application, plans, documents, drawings, and amendments, except as otherwise noted in the Specific Conditions.

Attachments:

1. Application to Construct/Modify Air Pollution Sources, DER Form 17-2.202(1), received August 18, 1986, with Jerome J. Guidry's cover letter dated August 15, 1986.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

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 Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement 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 applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. 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. This permit does not constitute 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 the permit.

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

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, 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, unless specifically authorized by an order from the department.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

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

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.
- () Determination of Lowest Achievable Emission Rate (LAER)

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

SPECIFIC CONDITIONS:

1. Operating hours shall not exceed 24/day, 500/month, and 6000 annually.
2. Maximum through-put rate of waste solvent mixture (75% perchloroethylene and 25% n-butyl alcohol) shall not exceed 120 gals/day, 2500 gals/month and 30,000 gals/year.
3. Maximum allowable VOC (volatile organic compounds) emissions shall not exceed 0.6 lbs/hr, 14.4 lbs/day, 300 lbs/month, and 1.8 tons/year.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

4. In accordance with FAC Rule 17-2.620(a), objectionable odors shall not be allowed off plant property.
5. In accordance with FAC Rule 17-2.240, no person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
6. The projected reclaiming/recovery efficiency of the solvent recovery system is 95% and shall be verified using a material balance scheme.
7. An annual operating report (AOR) shall account for the VOC through-put and emissions on a monthly basis, verifiable on a 24-hour basis. The AOR is to be submitted to the DER's Central Florida District office no later than March 1 of each calendar year, which will account for the previous year's VOC through-put and emissions. Cleaning solvents shall be accounted for and included in the AOR.
8. The existing solvent recovery still (AC 48-82738.D.) will be removed from service after debugging and placing the new solvent recovery system into service. All applicable sections of AC 48-82738 for the existing solvent recovery still shall then be surrendered to the Department and will no longer be valid.
9. 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 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (FAC Rule 17-4.09)

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's Central Florida District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rules 17-4.22 and 17-4.23)

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-124247
Expiration Date: April 30, 1987

SPECIFIC CONDITIONS:

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct, which can take up to 90 days to process a complete application. (FAC Rule 17-4.10)

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

889 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801-1088
305/423-7275

DER
AUG 18 1986
BAQM

August 15, 1986

Mr. C. H. Fancy, P.E.
Deputy Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

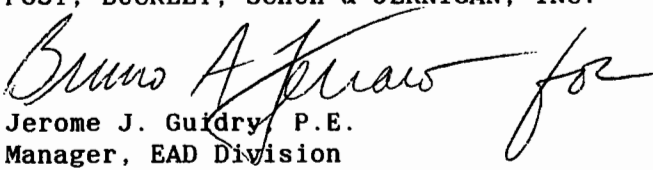
RE: Spiralkote, Inc.
Cyrel Plate Room Solvent Recovery System
Existing Application No. AC48-82739

Dear Mr. Fancy:

Enclosed are four (4) copies of the above referenced applica-
tion for the new solvent recovery still. Spiralkote is
replacing the existing still that was applied for in the
previous application with this new, more efficient system.
The project will result in lower overall VOC emissions. The
existing still will be taken out of service completely,
and no application fee should be required. If you have
any questions, call me or Bruno Ferraro at (305) 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.


Jerome J. Guidry, P.E.
Manager, EAD Division

JJG:BAF:daa

cc: Rob Rhodes
Robert Kindorf

Certified Mail No. P 274 158 744

21-023.00

AC 48-124247

BEST AVAILABLE COPY

RECEIVED AUG 11 1986

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOHNS RIVER DISTRICT

3319 MAGUIRE BOULEVARD SUITE 232 ORLANDO, FLORIDA 32803



DER

AUG 18 1986

BAQM

BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

ALEX SENKEVICH DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Printing Facility [] New [X] Existing

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: Spiralkote, Inc. COUNTY: Orange

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

SOURCE LOCATION: Street 1200 central Florida Parkway City Orlando

UTM: East 461370 North 3142050

Latitude 28 ° 24 ' 21"N Longitude 81 ° 23 ' 40 "W

APPLICANT NAME AND TITLE: Robert E. Kindorf, Vice President of Production

APPLICANT ADDRESS: 1200 Central Florida Parkway, Orlando, FL 32809

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Spiralkote, Inc.

I certify that the statements made in this application for a Construction 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. 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: Robert E. Kindorf

Robert E. Kindorf, Vice President Name and Title (Please Type)

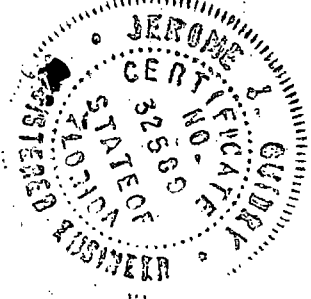
Date: 8-12-86 Telephone No. (305) 859-7780

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

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

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 Jerome J. Guidry

Jerome J. Guidry, P.E.
Name (Please Type)

Post, Buckley, Schuh & Jernigan, Inc.
Company Name (Please Type)

889 North Orange Avenue, Orlando, FL 32801
Mailing Address (Please Type)

Florida Registration No. 32589 Date: 8-14-86 Telephone No. (305) 423-7275

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 is for a solvent recovery still used to recover
the Butyl alcohol/perchloroethylene mixture used in the Cyrel
Plate room. This project will result in full compliance with
17-2 FAC.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

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.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC48-82739 - Existing application number

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 5 ; wks/yr 50 ;
if power plant, hrs/yr _____ ; if seasonal, describe: 6000 hrs/yr

F. 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. Ozone

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement 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

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No

a. If yes, for what pollutants? N/A

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation 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		
Waste Solvent	VOC	100	59.4	
25% n-Butyl Alcohol				
& 75% perchloroethylene				

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

1. Total Process Input Rate (lbs/hr): 59.4

2. Product Weight (lbs/hr): 56.4

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC	0.59	1.78	17-2.620	N/A	0.59	1.78	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 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).

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--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.

Still bottoms are shipped to a hazardous waste landfill along with
all hazardous wastes generated by this facility.

Brief description of operating characteristics of control devices: _____

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

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
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, design pressure drop, 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 8 1/2" 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 8 1/2" 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 8 1/2" 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. The appropriate application fee in accordance with Rule 17-4.05. 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 N/A

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

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

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: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

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:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² 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:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

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:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

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:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?

[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

SOURCE DESCRIPTION

Spent solvent from the Cyrel plate room operation is reclaimed in a Recyclene RX-35 Solvent Recovery System. The 25% butyl alcohol and 75% perchloroethylene mixture is recovered by distillation as a mixture. The still will process 120 gallons of waste solvent per day, recovering 95% (114 gallons) as clean solvent.

The unit has no stack; any VOC emissions which may occur will be released through a breather vent on the rear of the unit. The system is designed to maximize solvent recovery with minimal VOC releases. Less than one percent of the waste solvent throughput is assumed to be released as VOC emissions to be conservative. Under this assumption, approximately 4.8 gallons of still bottom (sludge) is produced and less than 1.2 gallons will be released to the atmosphere.

SUPPLEMENTAL REQUIREMENTS

Supplement 1: Total process input rate is 120 gallons/day of spent solvent mixture (25% n-Butyl alcohol, 75% perchloroethylene).

Solution weight = 11.8871 lbs/gal

$$11.8871 \text{ lbs/gal} \times 120 \text{ gal/day} \times \frac{1 \text{ day}}{24 \text{ hrs}} = 59.4 \text{ lbs/hr}$$

Product rate is equal to the amount of solvent recovered per hour. The still recovery efficiency is 95%.

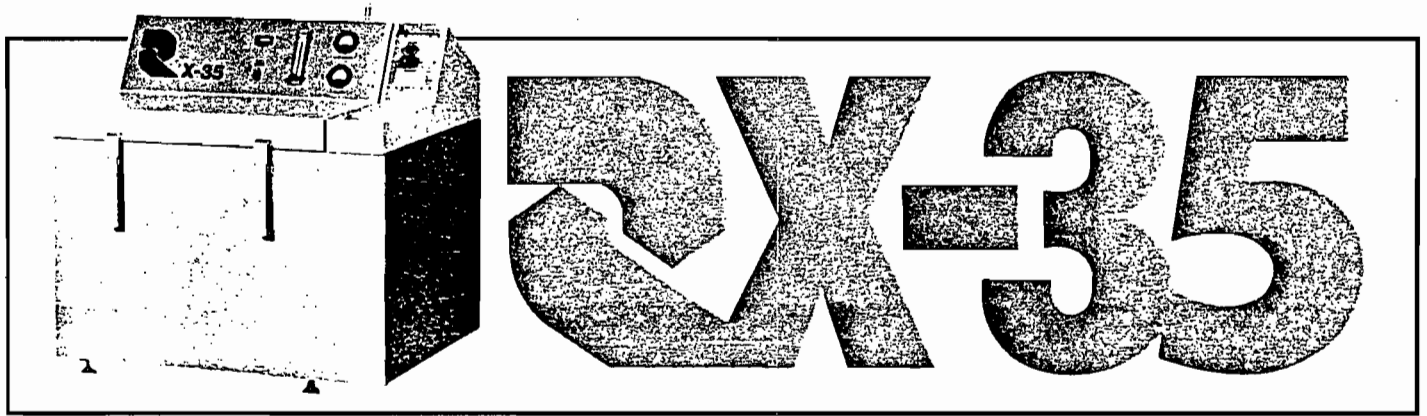
$$59.4 \text{ lbs/hr} \times 0.95 = 56.4 \text{ lbs/hr (product weight)}$$

Supplement 2: The system is designed to operate with no VOC emissions. To account for venting, less than one percent of throughput is assumed as VOC emissions.

$$59.4 \frac{\text{lb}}{\text{hr}} \times (0.01) = 0.59 \text{ lb/hr}$$

(See attached calculation sheet)

Proof of compliance will be demonstrated by calculations of solvent process rates submitted with the annual operation report.



RECYCLENE RX-35 SOLVENT RECOVERY SYSTEM

■ The RX-35 is a cost effective way to reduce your hazardous waste problems. Utilizing a patented design, the RX-35 allows you to purify (up to 99.5%) flammable and non-flammable solvents on-site safely and easily (as easy to operate as a washing machine). The RX-35, Recyclene's high production model, can usually pay for itself in less than a year if you generate 8 drums per month of waste solvent.

■ Fast payback—usually less than one year.

■ Reduces EPA liability—reclaims hazardous waste.

■ Simple to clean—patented disposable liner.

■ Easy to operate—push button control and gauges.

■ Safe to use—multiple shutdown controls and lid lock.

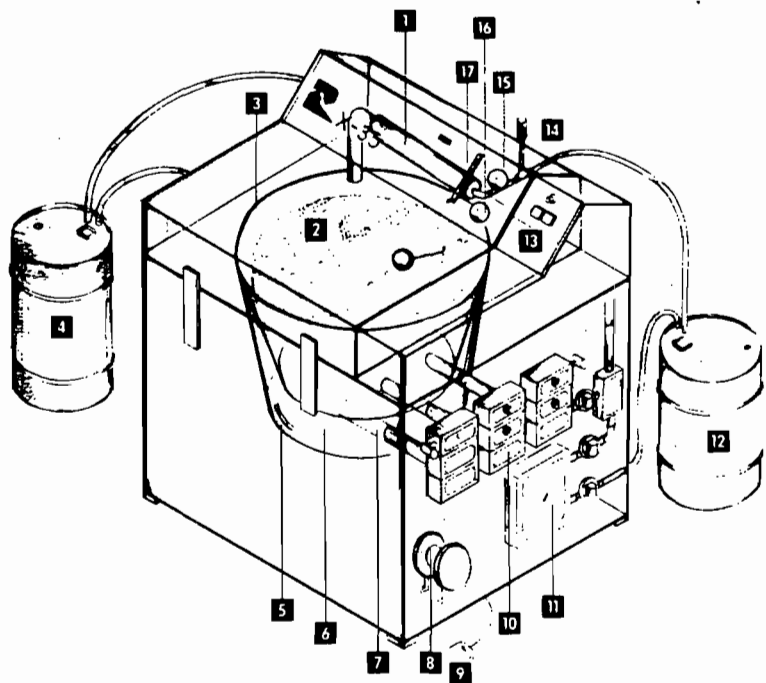
■ Multiple solvent applications—boiling points up to 400°F.

■ Explosion-proof construction—designed to meet NFPA specifications.

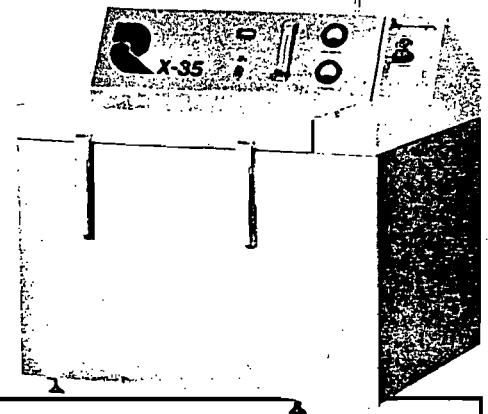
■ Optional automatic refill—for continuous operation.

■ Auto-quench and cooldown—activated when all solvent is distilled.

1. Shell and Tube Condenser
2. Solvent Liner (Nylon or Teflon)
3. Teflon Gasket Seal
4. Dirty Solvent Drum
5. Oil-Immersed Rapid Cooling System
6. Stainless Steel Double Boiler
7. Oil-Immersed Resistance Heater
8. Air-Operated Pump for Autofill
9. Pneumatic Lid Foot Pedal
10. Multiple System Thermostats (Explosion-proof):
 - a. Vapor
 - b. Condenser
 - c. Boiler
 - d. Lid Interlock
 - e. Safety
11. Main Contactor Box
12. Clean Solvent Drum
13. On/Off Controls and "Cycle On" Light Panel
14. Breather Vent
15. Vapor Temperature Gauge
16. Oil Temperature Gauge
17. Water Flow Meter



RX-35



RECYCLENE EQUIPMENT SPECIFICATIONS

DIMENSIONS

Width	51 in.
Depth	52 in.
Maximum height	51 in.
Weight, uncrated	872 lbs.
Weight, crated	1112 lbs.
Boiler capacity	35 gal.

UTILITIES

Voltage AC 50/60 Hz	240 volts
Current	24 amps
Cooling water flow	75 GPH
Maximum cooling water temperature	70°F
Water temperature increase	30°F
Cooling water pressure	50-100 PSI
Compressed air pressure	80-100 PSI
Drain	OPEN

PERFORMANCE

Typical warm-up time	1.5 hrs.
Typical purity	99%
Typical yield	95%
Maximum solvent boiling point	400°F
Maximum contaminant	30%

PROCESS RATES*

SOLVENT	BOILING PT. (°F)	GALLONS PER HOUR AFTER WARM-UP
Methylene Chloride	104	19
Freon TF	118	37
Acetone	134	21
Methanol	150	10
1,1,1 Trichloroethane	162	26
Ethanol	170	12
M.E.K.	175	22
IPA	180	14
Trichloroethylene	189	21
Toluene	232	24
Perchloroethylene	250	22
N-Butyl Acetate	255	26
Xylene	290	24
Mineral Spirits (Stoddard)	375	16

*The above data is estimated for pure solvents only. Actual rates will be lower depending on the percentage of and type of contaminants in the solvent, supply voltage and batch size.

CONSTRUCTION

Boiler	Stainless steel
Heat exchange condenser	Alloy
Immersed heater	9900 watts
Heating medium	Proprietary, low viscosity, long-life heat transfer fluid
Electrical components	Explosion-proof—meets highest standards NFPA Class 1 Division 1, Group D

INSTRUMENTATION

Oil temperature gauge	Type J Thermocouple 30-600°F
Vapor temperature gauge	Type J Thermocouple 30-600°F
Water flow meter	0-100 GPH
Control thermostats	SPST snap acting control 0-450°F

SAFETY FEATURES

Automatic cycle shutdown at power interruption	Cycle "ON" light
Automatic cycle cooldown when solvent supply has distilled	Vacuum vent
In-line fuses	Designed to shut down if:
Lid interlock until cooldown achieved	• Power failure
U.L. listed components	• Water flow interruption
	• Boiler overheat
	• Excessive water temperature
	• Oil level deficiency

ADDITIONAL FEATURES

Patented disposable bag to line boiler
 Totally immersed cooling coil
 Special industrial insulation
 Stainless steel or teflon wetted parts
 No rotating mechanical parts
 Unit levelers
 Pneumatic lift for lid
 Low water consumption
 Stainless steel fittings
 One year warranty

LOCATION FOR INSTALLATION

Mandatory to conform to NFPA Class 1, Div. 1, Group D.
 May be non-hazardous if solvents are non-flammable.
 See NFPA Codes.

OPTIONAL AUTOFILL SYSTEM

Dual diaphragm pump	Air logic controls
Teflon seals	Automatic boiler feed
Self priming pump	Teflon flow lines
Secure drum connectors	

EMISSION CALCULATIONS FOR VOLATILE ORGANIC COMPOUNDS

Comment: Spiralkote RX-35 Solvent Recovery System

Chemical name: Butyl alcohol/perchloroethylene

Chemical density: 1.4258 grams per cubic centimeter

or 11.887 pounds per gallon

VOC concentration: 11.887 pounds per gallon

or 100.0 per cent

Emission rate: 0.05 gallons per hour

or 0.5943 pounds per hour

VOC control efficiency: 0 per cent

Operating shedule: 24 Hours per day

5 Days per week

50 Weeks per year

TOTAL 6000 Hours per year

$$\begin{aligned} \text{Potential emissions} &= (\text{Usage rate}) \times (\text{VOC Concentration}) \\ &= (0.05) \times (11.887) \\ &= 0.5943 \text{ lb per hr} \times 6000 \text{ hr per year} \\ &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\ &= 1.7830 \text{ Tons per year} \end{aligned}$$

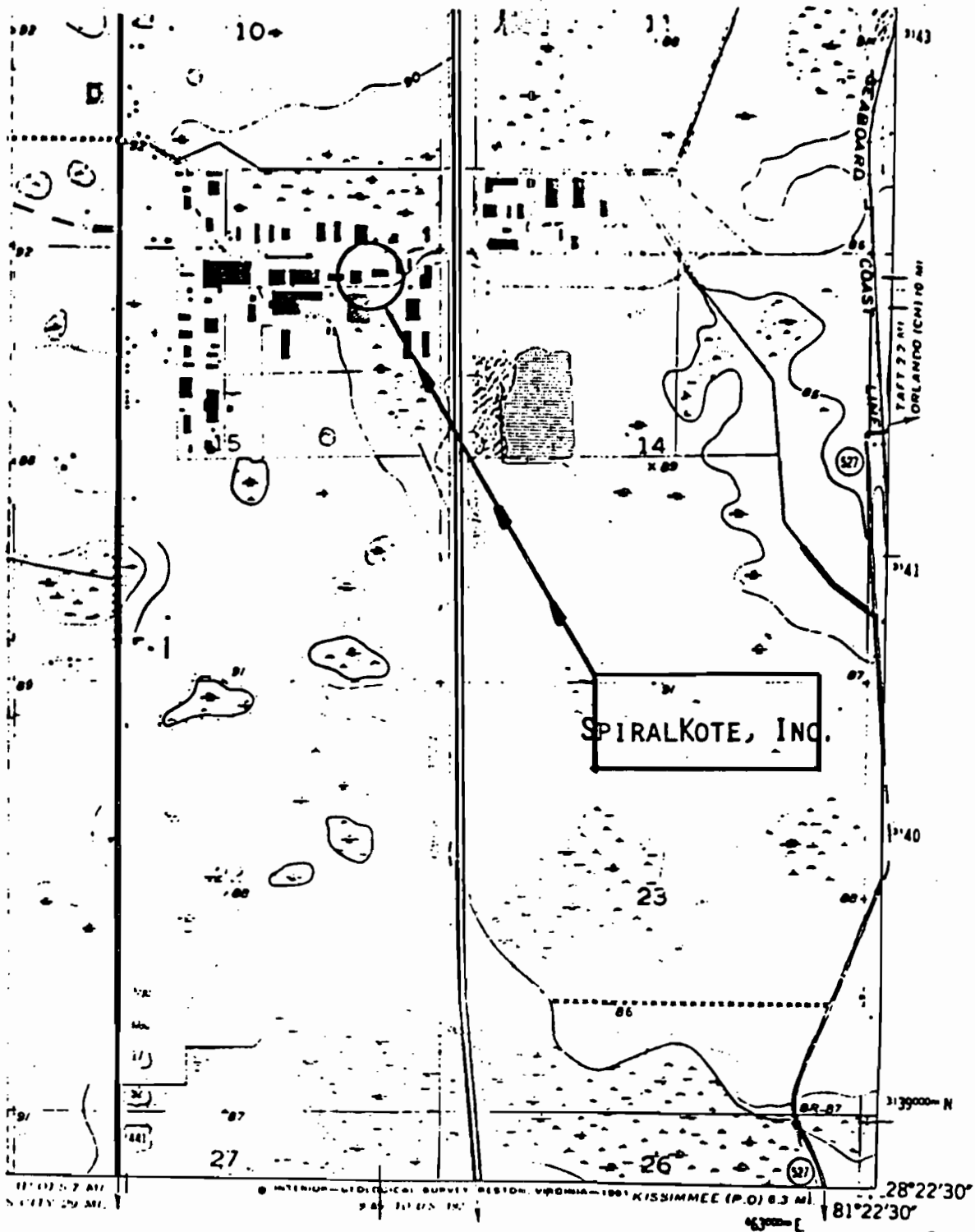
$$\begin{aligned} \text{Maximum emissions} &= \text{Potential emissions} \times (1 - \text{Efficiency}) \\ &= (0.5943) \times (1 - 0) \\ &= 0.5943 \text{ pounds per hour} \end{aligned}$$

$$\begin{aligned} \text{Actual emissions} &= \text{Maximum emissions} \times \text{Operating schedule} \\ &= 0.5943 \text{ lb/hr} \times 6000 \text{ hrs/year} \\ &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\ &= 1.7830 \text{ tons per year} \end{aligned}$$

04-Aug-86

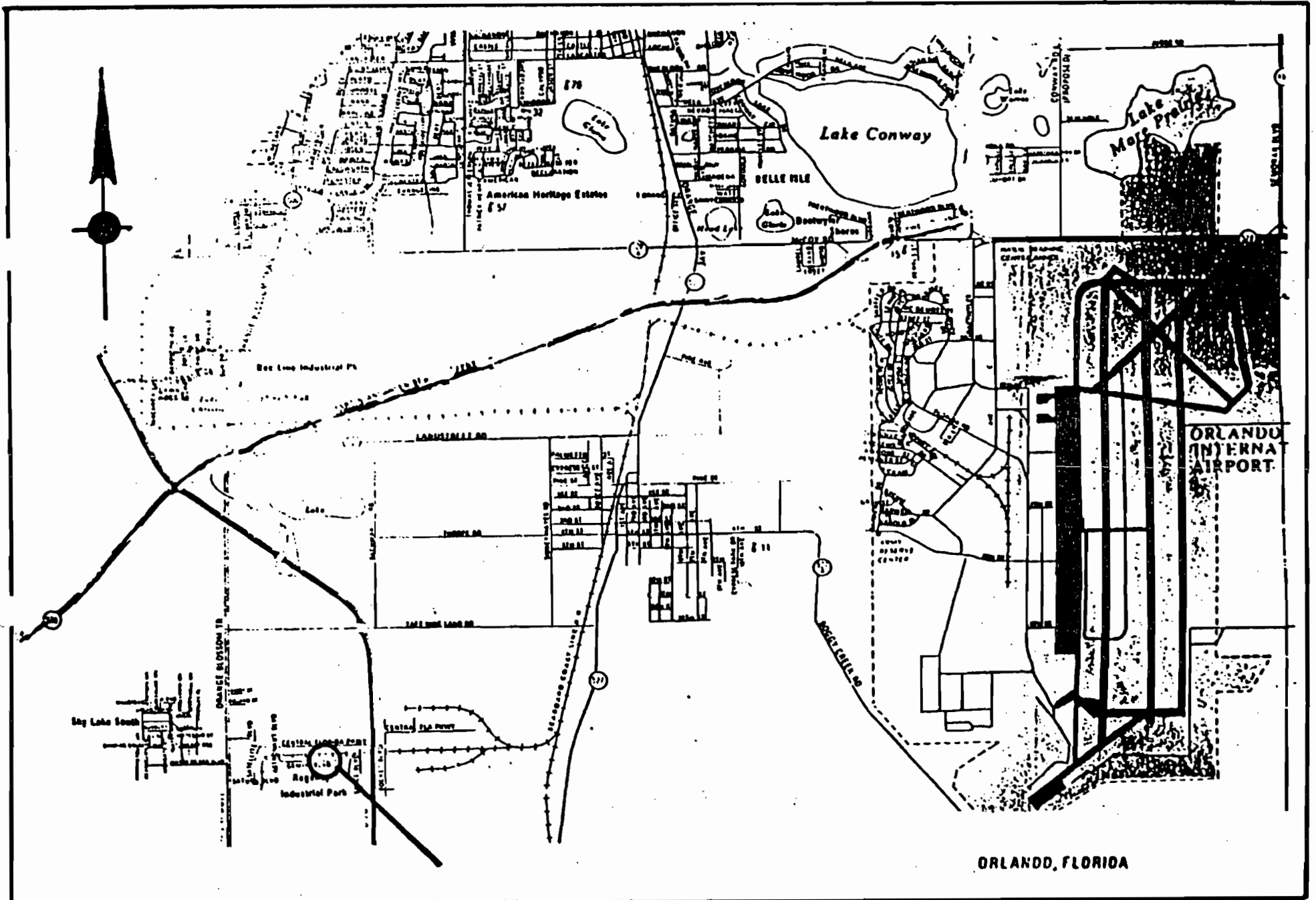
SITE LOCATION MAP -- U.S.G.S. MAP SECTION

SPIRALKOTE, INC.



ROAD CLASSIFICATION

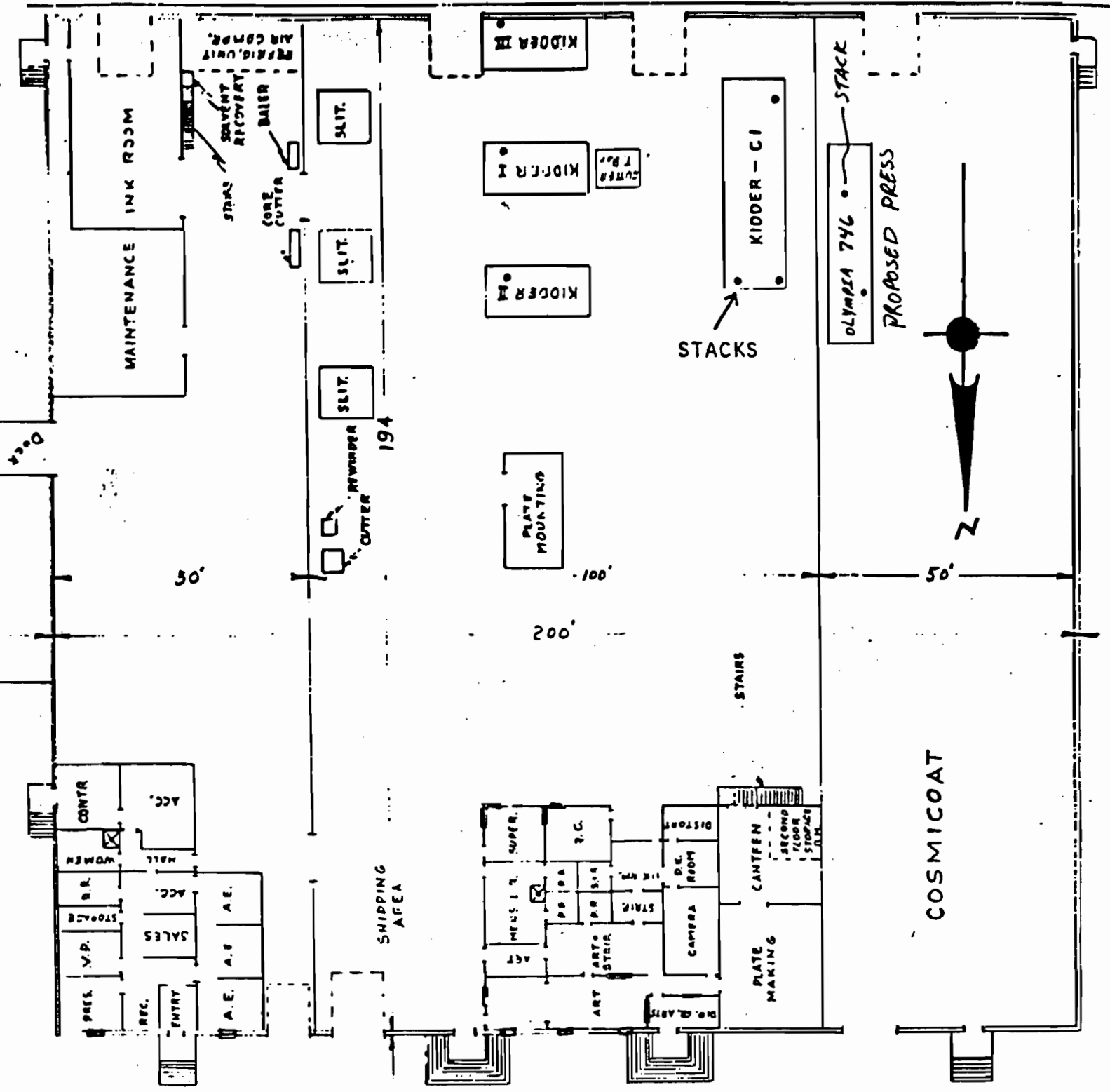
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ORLANDO, FLORIDA

SPIRALKOTE, INC. GENERAL LOCATION MAP

PLOT PLAN OF FACILITY SPIRALKOTE, INC.

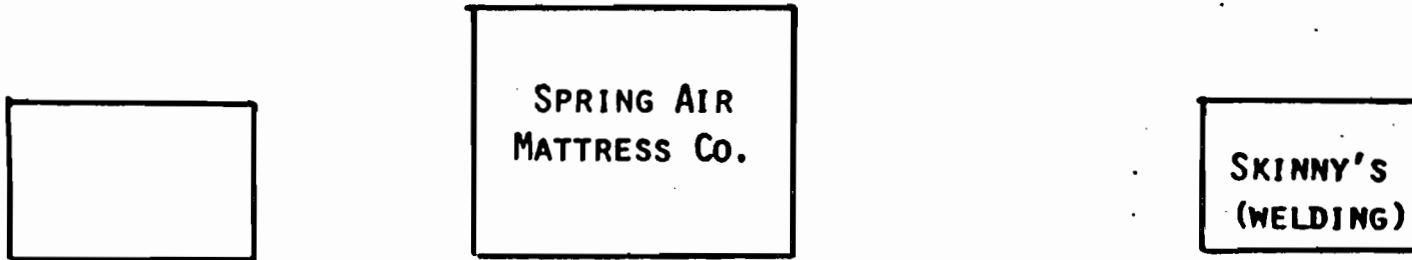


(FRONTS ON CENTRAL FLORIDA PARKWAY)

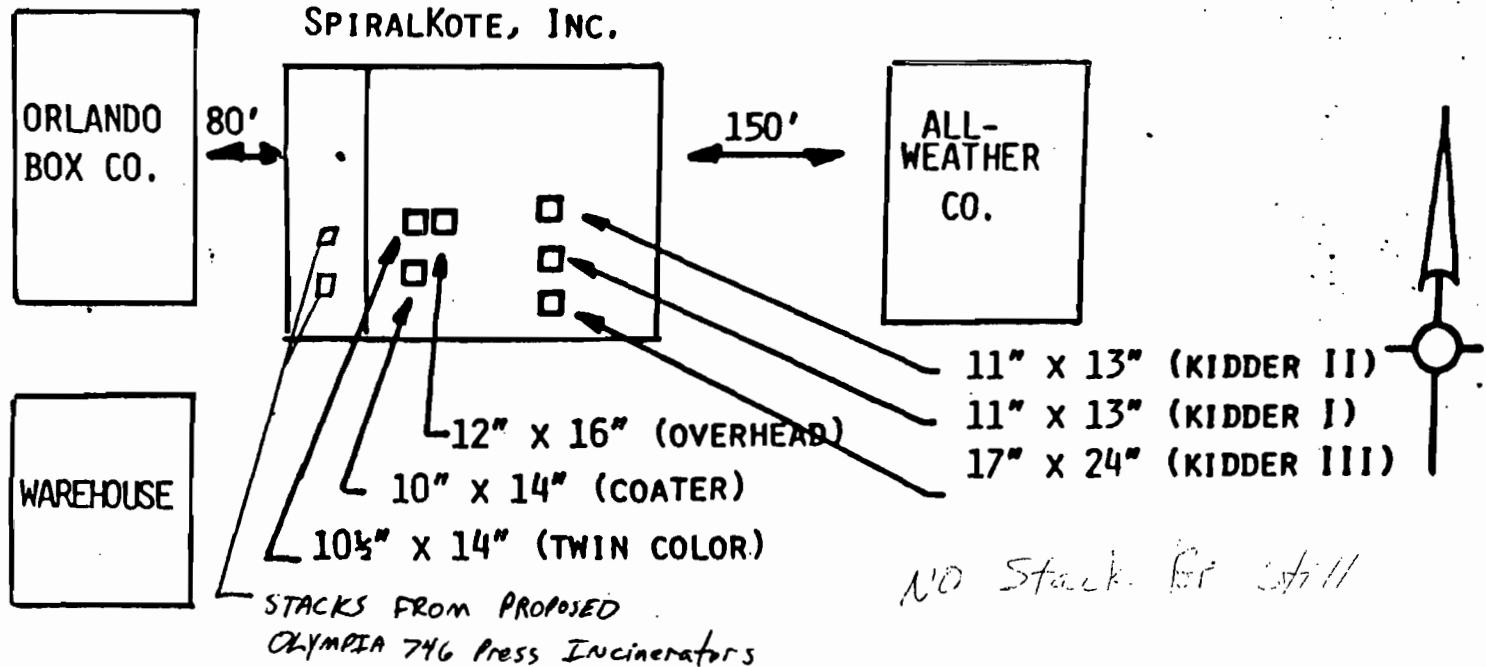
BEST AVAILABLE COPY

PLOT PLAN OF AREA/ROOF SKETCH SPIRALKOTE, INC.

LOCATED IN THE
REGENCY INDUSTRIAL PARK



CENTRAL FLORIDA PARKWAY



NOT TO SCALE