

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

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.

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

DER

NOV 24 1986

ADVERTISING CHARGE \$92.27

State of Florida)
COUNTY OF ORANGE) SS.

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. 1986



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

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 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.

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 14 days of the publication of this notice will be considered in the department's final determination.
Nov. 19, 1986
CL-184

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

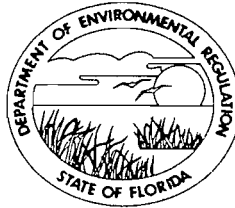


VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

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.

AC 48-124247

STATE OF FLORIDA

RECEIVED AUG 11 1986

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 Cyrel Plate Room Solvent 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. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit 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

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

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

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 Costs:

9. Emissions:

Contaminant

Rate or Concentration

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).

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%.

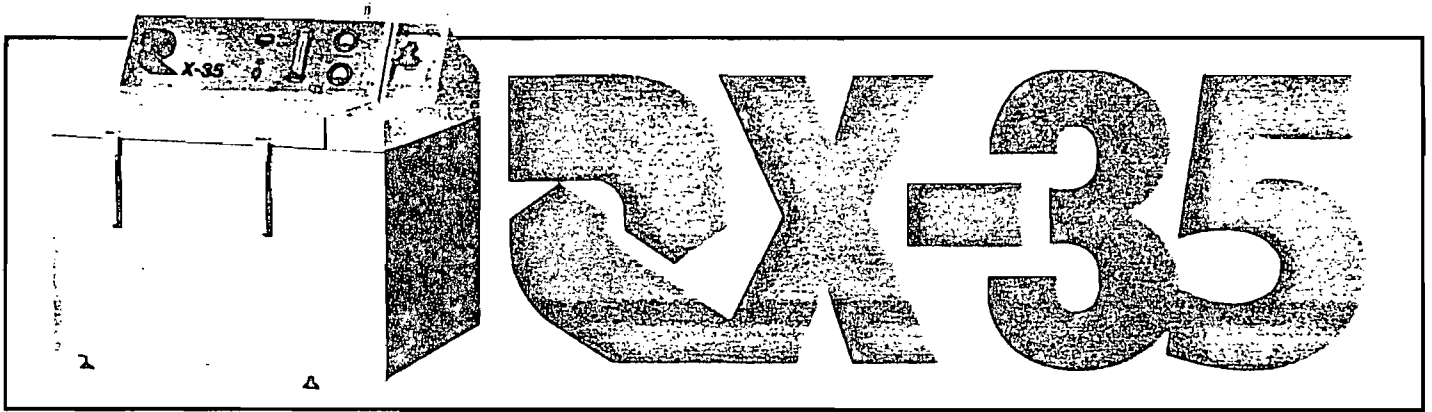
$$59.4 \text{ lbs/hr} \times 0.95 = 56.4 \text{ lbs/hr (product weight)}$$

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.

$$59.4 \text{ hr} \times \frac{1 \text{ lb}}{100} = 0.59 \text{ lb/hr}$$

(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.

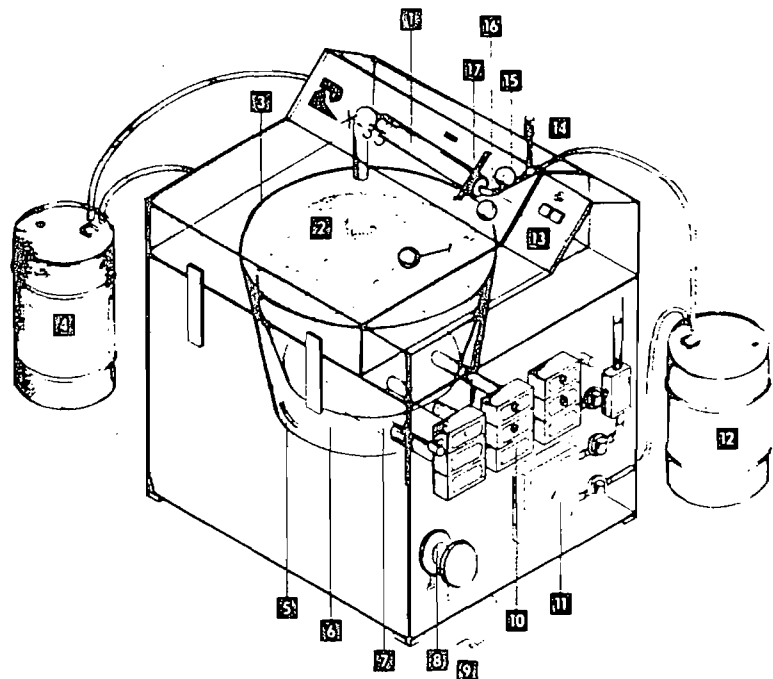
■ Multiple solvent applications—boiling points up to 400°F.

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

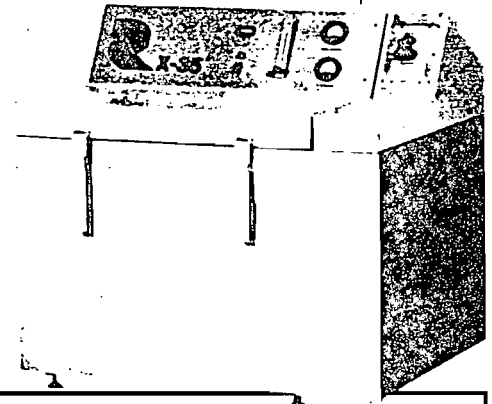
■ Optional automatic refill—for continuous operation.

■ 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



RX35



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 overheating
	• 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

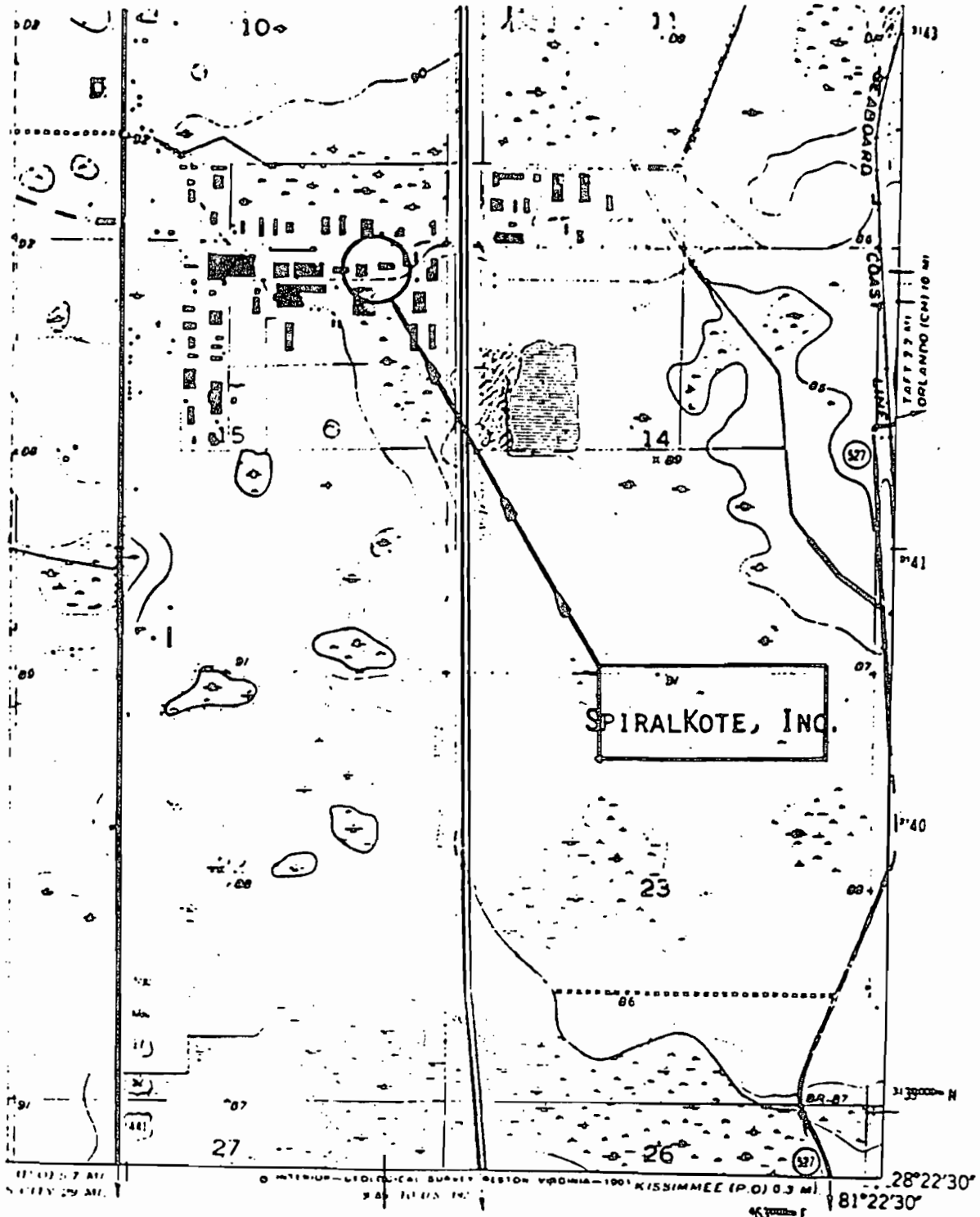
TOTAL 6000 Hours per year

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

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

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

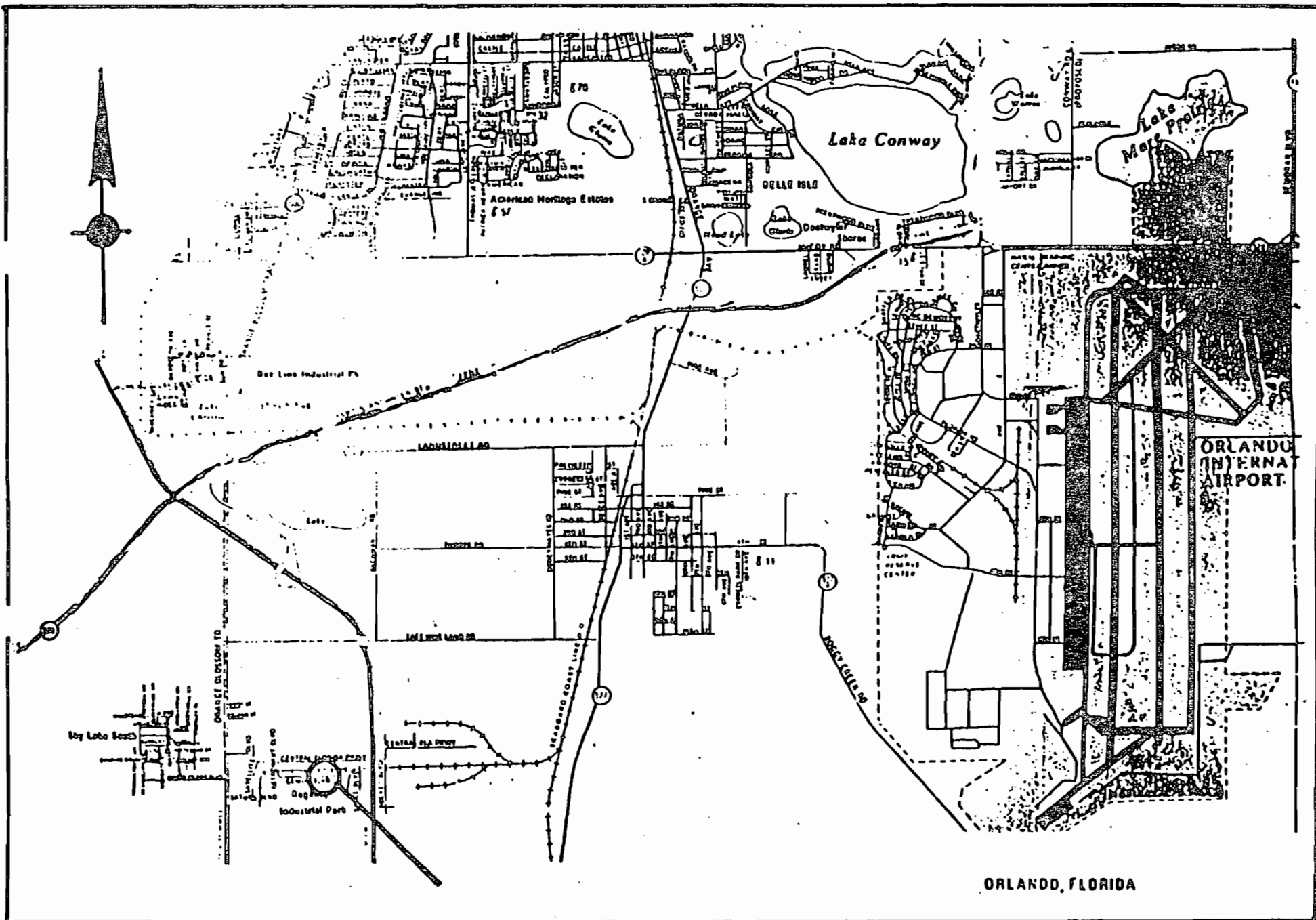
SITE LOCATION MAP -- U.S.G.S. MAP SECTION
SPIRALKOTE, INC.



ROAD CLASSIFICATION

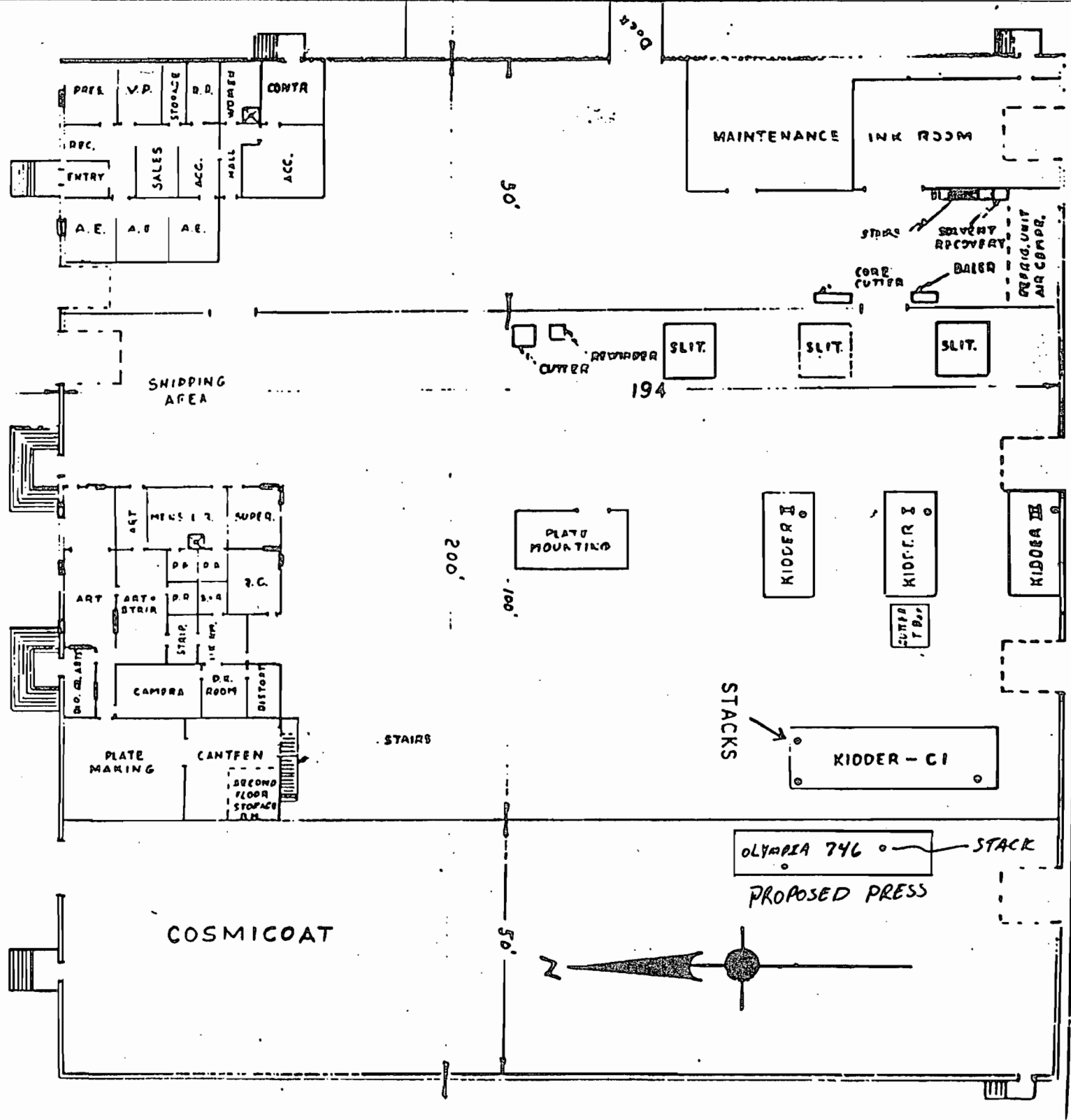
28°22'30"
81°22'30"

157. CLK

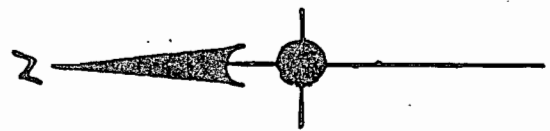


SPIRALKOTE, INC. GENERAL LOCATION MAP

PLOT PLAN OF FACILITY
 SPARKOTE, INC.



(FRONTS ON CENTRAL FLORIDA PARKWAY)



Bruce's 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

June 19, 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 Permits:
AC 48-82733 and -117138

The Department is in receipt of Mr. Jerome J. Guidry's letter dated May 19, 1987, which requested an extension of the expiration date for the above referenced permits. The following shall be changed and added:

Expiration Date:

- o AC 48-82733
From: June 30, 1987
To: November 30, 1987
- o AC 48-117138
From: July 31, 1987
To: November 30, 1987

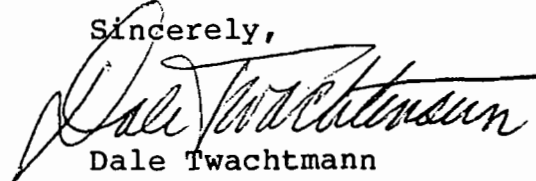
Attachment to be Incorporated:

- o AC 48-82733
34. Mr. Jerome J. Guidry's letter dated May 19, 1987, and received May 26, 1987.
- o AC 48-117138
5. Mr. Jerome J. Guidry's letter dated May 19, 1987, and received May 26, 1987.

Mr. Robert E. Kindorf
Page Two
June 19, 1987

This letter must be attached to your construction permits, Nos. AC 48-82733 and -117138, and shall become a part of the permits.

Sincerely,

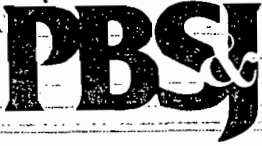


Dale Twachtmann
Secretary

DT/ks

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

AC 48-82733: ATTACHMENT 34
AC 48-117138: ATTACHMENT 5



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

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

PM
5-21-87
Orlando, FL

CM: [P-609-603-422]

File 10/17

DER

MAY 26 1987

BAQM

May 19, 1987

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

RE: Spiralkote, Inc.
Orange County, AP
Kidder CI Press - AC48-82733
Olympia 746 Press - AC48-117138

Dear Mr. Fancy:

We are requesting extensions to the expiration dates of the above referenced construction permits. We expect to have the stack test results by July 1, 1987 and the certificate of completion application submitted by July 30, 1987. In order to give the Department ample time to review the test results and the applications, we wish to extend the two permit expiration dates to November 30, 1987.

If you have any questions regarding this request, please contact either Bruno Ferraro at (305) 298-2282 or me at (305) 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.

Jerome J. Guidry, P.E.

cc: Robert E. Kindorf
Bruno A. Ferraro
A. T. Sawicki
Rob Rhodes

Certified Mail No. P 609 605 422

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

January 21, 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 48-117138

The department is in receipt of Mr. Jerome J. Guidry's letter dated January 5, 1987, which requested an extension of the expiration date for the above referenced permit. The bureau is in agreement with the request and the following shall be changed and added:

Expiration Date:

From: March 31, 1987
To: July 31, 1987

Attachment to be Incorporated:

4. Mr. Jerome J. Guidry's letter dated January 5, 1987 and received January 8, 1987.

This letter must be attached to your construction permit No. AC 48-117138 and shall become a part of the permit.

Sincerely,

Howard L. Rhodes, P.E.
Director, Division of
Environmental Programs

HLR/ks

cc: T. Sawicki
J. Cobb Costas

ATTACHMENT 4



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

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

PM
1-6-87
Delivered, FL

DER

JAN 8 1987

BAQM

January 5, 1987

Mr. A. T. Sawicki, P.E.
Air Permitting Section
Florida Department of Environmental Regulation
St. John's River District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

RE: Spiralkote, Inc. - AC48-117138
Olympia 746 Flexographic Printing
& Coating Unit & Associated Catalytic
Incineration System

Signed/Issued Aug 22, '86
Exp. 3/31/87

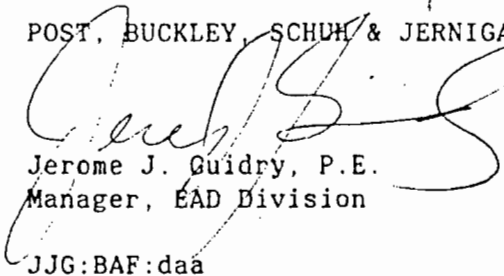
Dear Mr. Sawicki:

We are requesting a four (4) month extension on the expiration date of the above referenced permit. Please change the expiration date to July 31, 1987. We had some delays in acquiring and assembling the press, and we expect the press to be "on line" by mid February.

If you have any questions, please call me at (305) 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.


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

JJG:BAF:daa

cc: Bruce Mitchell - Certified Mail # P 387 903 541
Bob Kindorf

Certified Mail No. P 387 903 541

21-023.00

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 15, 1986

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 Permits:
AC 48-82733, -82735 and -82736

The department is in receipt of Mr. Robert L. Rhodes' letter dated September 16, 1986, which requested an extension of your expiration date for the above referenced permits. The bureau is in agreement with the request and the following shall be changed and added:

Expiration Date:

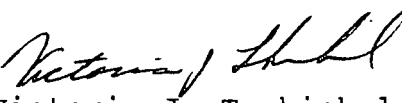
From: December 31, 1986
To: June 30, 1987

Attachment to be Incorporated:

33. Mr. Robert L. Rhodes' letter dated September 16, 1986.

This letter must be attached to your construction permits, Nos. AC 48-82733, -82735 and -82736, and shall become a part of the permits.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/ks

cc: T. Sawicki
J. Cobb
R. Rhodes

ATTACHMENT 33

LAW OFFICES

HOLLAND & KNIGHT

406 THIRTEENTH STREET WEST
P. O. Box 1669
BRADENTON, FLORIDA 33508
(813) 746-7107

110 EAST BROWARD BLVD.
P. O. Box 14005
FORT LAUDERDALE, FLORIDA 33302
(305) 525-1000

92 LAKE WIRE DRIVE
P. O. DRAWER B W
LAKELAND, FLORIDA 33802
(813) 682-1161

1200 BRICKELL AVENUE
P. O. Box 015441
MIAMI, FLORIDA 33101
(305) 374-8500

255 SOUTH ORANGE AVENUE
P. O. Box 1526
ORLANDO, FLORIDA 32802
(305) 425-8500

2033 WOOD STREET
P. O. DRAWER 49768
SARASOTA, FLORIDA 33578
(813) 365-3321

BARNETT BANK BLDG.
P. O. DRAWER 810
TALLAHASSEE, FLORIDA 32302
(904) 224-7000

600 NORTH FLORIDA AVE.
P. O. Box 1288
TAMPA, FLORIDA 33601
(813) 223-1621

PLEASE REPLY TO:

Tallahassee
September 16, 1986

888 SEVENTEENTH STREET, N. W.
SUITE 400
WASHINGTON, D. C. 20006
(202) 955-5550

CABLE ADDRESS
HND KNIGHT TPA
H&K MIA
TELEX 5-2630-TAMPA
TELEX 52-2233-MIAMI

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

Re: fp Spiralkote, Inc.--
Air Pollution Source Construction Permits
AC48-82733 (Kidder CI), AC48-82735 (Kidder I);
AC48-82736 (Kidder II & III)

Dear Mr. Fancy:

In accordance with the applicable Specific Conditions in each of the above-referenced permits, permittee fp Spiralkote, Inc. (Spiralkote) requests an extension of the construction permit expiration date from December 31, 1986, to June 30, 1987. (By our letter of July 2, 1986, we requested an extension until December 31, 1986. We understand that this extension request has been granted although we have not received any formal notification to this effect.)

Initial source tests on Kidder CI, and on Kidder II/Kidder III have indicated certain operational difficulties. The incinerators are in operation and are removing a significant percentage of the VOCs but have not yet attained the required removal efficiency.

Spiralkote's consulting engineers are working with the company responsible for construction and installation of the units as well as with the company responsible for design and manufacture to pinpoint problem areas. We are advised that progress is being made toward resolving the apparent difficulties. We are further advised that additional compliance tests will be scheduled for October.

Therefore, it will be necessary to extend the expiration dates of the subject construction permits until June 30, 1987, to

C. H. Fancy, P.E.
September 16, 1986
Page 2

allow time for the results of the compliance tests to be included in the applications for operating permits so that these applications can be filed at least 90 days prior to the expiration date of the construction permits as required by the applicable Specific Conditions. The requested extension should allow adequate time for processing the complete permit applications.

With regard to Kidder I, an extension is requested so that Spiralkote can install its new Olympia press. When the new press is operational, Kidder I will be dismantled and sold thus negating the need for an operation permit.

Finally, you will note that no extension is required for the Cyrel Plate Room permit (AC48-82733). We are advised that a complete application for an operating permit for this facility will be filed on or before October 1, 1986. Hopefully, this will allow the Department to process the permit for issuance well before the December 31, 1986, expiration date of the construction permit. The company, however, reserves the right to seek an additional extension of the construction permit to allow for complete processing of the operation permit application.

We are advised that representatives of Post, Buckley, Schuh & Jernigan have conferred with Bruce Mitchell concerning the need for this extension.

If you have any questions concerning the matter, please contact me as soon as possible.

Sincerely,

HOLLAND & KNIGHT



Robert L. Rhodes, Jr.

RLRjr/cs
cc: Mr. Bruce Mitchell
Gary Early, Esquire
Mr. Robert Kindorf
Mr. William Kindorf
Bruno A. Ferraro
24777-1L9/15:87

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


August 25, 1986

Enclosed is Permit Number AC 48-117138 to Spiralkote, Inc. which authorizes the construction of a printing and coating unit and associated catalytic incinerator at the existing Spiralkote, Inc. facility 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 J. Guidry, P.E.
Tom Sawicki

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on August 26, 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
Clerk

August 26, 1986
Date

Final Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Permit Number:
AC 48-117138

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

August 21, 1986

Final Determination

The construction 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 July 14, 1986. The technical evaluation and preliminary determination were available for public inspection at the DER's St. Johns River 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)
COUNTY OF ORANGE) SS.

Before the undersigned authority personally appeared
Catherine Deering

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 advertisement, 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
July 14, 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.

Sworn to and subscribed before me this 17th day
of July A.D., 19 86

Nancy A. Puglia

Notary Public, State of Florida at Large Notary Public

My Commission Expires May 25, 1987

Boarded by American Pioneer Casualty Ins. Co.

FORM NO. AD-262



ADVERTISING CHARGE \$94.27

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT

The Department gives notice of its intent to issue a permit to Spiralkote, Inc. for the construction of a printing and coating unit and associated catalytic incinerator system at the existing Spiralkote, Inc., facility located at 1200 Central Florida Parkway 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) pursuant to 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 Model 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 an administrative determination (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 32301

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.

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 48-117138
Expiration Date: March 31, 1987
County: Orange
Latitude/Longitude: 28° 24' 21"N
81° 23' 40"W/
Project: Olympia 746 Flexographic
Printing & Coating Unit & Associated
Catalytic Incinerator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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/installation of the Olympia Model 746 Central Impressions, which is a flexographic printing and coating unit with three associated natural gas dryers: a 0.8×10^6 Btu/hr - overhead dryer, a 0.5×10^6 Btu/hr overhead dryer, and a 0.15×10^6 Btu/hr tunnel oven. The dryers will operate at an idling level when not being used for production. The associated catalytic incinerator system will have a minimum 70% capture and transport efficiency and 95% destruction efficiency. The incinerator system will be custom designed by Etter Engineering Company, Inc., and consist of two identical 2500 CFM natural gas fired (0.4×10^6 Btu/hr) units utilizing an Eclipse model 80-AHO burner. The duct work and collection system will be designed and installed by Dec-E-Tech Industrial Design Engineering. The source emits volatile organic compounds and organic solvents (used for clean-up). The Olympia 746 will replace the existing Kidder I. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group No. 275 - Commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The source shall be as reflected in the permit application, plans documents, drawings and amendments, except as otherwise noted on pages 5-7 of the "Specific Conditions."

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and Jerome J. Guidry's cover letter dated March 3, 1986, and received March 7, 1986.
2. C. H. Fancy's letter dated April 1, 1986.
3. Jerome J. Guidry's letter dated April 24, 1986, and received April 28, 1986.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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. The hours of operation shall not exceed 520 per month and 6240 annually.
2. The maximum allowable VOC (volatile organic compounds-organic solvents) emission limit shall not exceed 22.8 pounds per hour, 5.9 tons per month, and 71.3 tons per year (based on minimum 70% capture and transport efficiency and 95% destruction efficiency (oxidizes at least 95% of the VOC measured as total combustible carbon, to carbon dioxide and water) and includes 1 TPY clean-up solvent). The maximum rated production capacity is 26 reams per hour (based on 3000 square feet per ream).

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 1987

SPECIFIC CONDITIONS:

3. A compliance test shall be conducted to determine the control system's capture and transport efficiency and the incinerator's destruction efficiency. The compliance test shall be conducted while operating at 100% of the rated production capacity. All subsequent compliance test(s) can be conducted while the unit is operating at 90-100% of the rated production capacity.

o Destruction efficiency determination

The test method shall be EPA Method 25, Appendix A, 40 CFR 60, or other test method(s) approved by the department.

o Capture and transport efficiency determination

The procedure proposed by the permittee involves the determination and comparison of the amount of VOC used during the test and the VOC concentration measured at the inlet of the incinerator over the same period of time.

4. All compliance tests shall require written notification to the DER's St. Johns River District office fifteen (15) days prior to the day of a test. All test(s) results shall be submitted to the DER's St. Johns River District office forty-five (45) days after completion of the last test run.

5. Objectionable odors shall not be allowed off plant property.

6. The units are subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.

7. According to 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.

8. All VOC emissions shall be accounted for monthly and verifiable on a 24-hour basis, and should include clean-up solvents. The annual VOC use and emissions shall be submitted in an AOR (annual operating report) to the DER's St. Johns River District office within sixty (60) days after the anniversary date of the operating permit once acquired.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 1987

SPECIFIC CONDITIONS:

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 St. Johns River 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)

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)

10. Upon the completion of the requirements contained in Specific Condition #9 or the receipt of an operation permit, whichever occurs first, the permittee will surrender to the department all air pollution permits associated with Kidder I.

Issued this 22 day of August 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

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

June 20, 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 flexographic printing and coating unit at your 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,


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

CHF/pa

Attachments

cc: Jerome J. Guidry, P.E.
Tom Sawicki

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Spiralkote, Inc., for the construction of a printing and coating unit and associated catalytic incinerator system at the existing Spiralkote, Inc., facility located at 1200 Central Florida Parkway 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 32301

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 48-117138

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 March 7, 1986, to the Department of Environmental Regulation for a permit to construct a flexographic printing and coating unit and associated catalytic incinerator system to be located at the applicant's existing 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.

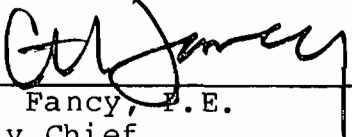
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation 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



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

Copies furnished to:

Jerome J. Guidry, P.E.
Tom 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 June 20, 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 June 20, 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

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,

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.

(h) 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

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)

Technical Evaluation
and
Preliminary Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Permit Number:
AC 48-117138

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

June 20, 1986

I. Project Description

A. Applicant

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

B. Project Description

The applicant proposes to replace an existing uncontrolled flexographic printing and coating unit designated Kidder I, which has potential VOC (volatile organic compounds or organic solvents) emissions of 49.6 tons per year (TPY; includes 1.9 TPY clean-up solvent), with a new Olympia Model 746 Central Impressions printing and coating unit. It will be equipped with an emissions collection system and two identical Etter Engineering catalytic incinerators to control VOC. The projected potential VOC emissions are 71.3 TPY (includes 1 TPY clean-up solvent), a net increase in facility VOC potential emissions of 21.7 TPY.

The incinerators are to be custom designed by Etter Engineering Company, Inc. and the duct work, collection system, and installation will be done by DEC-E-TECH Industrial Design Engineering. Each incinerator is a 2500 CFM natural gas fired system utilizing an Eclips Model 80-AHO burner. Heat recovery units associated with each incinerator will supply heat to the preheat chamber of the incinerator, thus reducing the amount of natural gas consumed.

The SIC (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

The flexographic printing and coating unit, the Olympia 746, will be used to produce composite can labels. While replacing Kidder I, the overall production will increase. The maximum rated production capacity for the Olympia 746 is 26 reams per hour (based on 3000 square feet per ream) while the Kidder I is rated at 9.17 reams per hour.

Two overhead dryers and one tunnel oven will be fired with natural gas and used to dry the production material. At times of

no production, the natural gas usage will be lowered to a minimum operating level.

Two catalytic incinerators utilizing natural gas will be used to destroy VOC emissions captured and transported to the inlet of the incinerator. The projected minimum capture/transport and destruction efficiencies are 70% and 95%, respectively.

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 deemed complete on April 28, 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 the pollutant 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 (NO_x), sulfur dioxide, carbon monoxide, particulate matter and hydrocarbons as a result of the combustion of natural gas. With exception of NO_x, the total facility projected potential emission for each pollutant is less than 0.5 TPY and considered insignificant. The total facility NO_x emissions are estimated to be 1.5 TPY and also considered insignificant.

The projected potential VOC emissions associated with the Olympia 746 are exhibited in the following table:

Table 1

	<u>Potential VOC Emissions (TPY)</u>
Olympia 746	70.3
Clean-up Solvent	1.0
Total:	<u>71.3</u>

The contemporaneous VOC emissions decreases associated with Kidder I are exhibited in the following table:

Table 2

	<u>Contemporaneous VOC Emissions (TPY)</u>
Kidder I	47.7
Clean-up Solvent	1.9
Total:	<u>49.6</u>

The net VOC potential emissions increases associated with the proposed installation of the Olympia 746 and the retirement of Kidder I are exhibited in the following table:

Table 3

<u>Source</u>	<u>Net VOC Potential Emissions (TPY)</u>
Olympia 746	71.3
Kidder I	-49.6
Net:	<u>+21.7</u>

Based on Table 3, the proposed project would constitute a minor modification to a major facility. Since the increase is less than the significant levels pursuant to Table 500-2, the VOC emissions shall be exempt from new source review pursuant to FAC Rule 17-2.510(4) in accordance with FAC Rule 17-2.510(2)(d)4. Therefore, the proposed project's VOC emissions shall be subject to review pursuant to FAC Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The source's allowable VOC emission limiting and performance standards shall be in accordance with FAC Rules 17-2.620, General Pollutant Emission Limiting Standards, and 17-2.650(1)(f)16., Graphic Arts Systems.

Since the associated VOC control system for the Olympia 746 was designed such that it is an integral part of the total operation, the department accepts the applicant's recommended VOC minimum capture and transport efficiency of 70% pursuant to FAC Rule 17-2.620(1)(a). Also, the department accepts the applicant's recommended VOC minimum destruction efficiency of 95% (oxidizes at least 95% of the VOC, measured as total combustible carbon, to carbon dioxide and water) pursuant to FAC Rules 17-2.620(1)(a) and 17-2.650(1)(f)16.b.(c).

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 in accordance with FAC Rule 17-2.240, Circumvention.

The source is subject to the provisions of FAC Rule 17-2.250(1), (4), (5), and (6), Excess Emissions.

According to FAC Rule 17-2.620(2), no person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance according to FAC Rule 17-2.100(130). Therefore, objectionable odors shall not be allowed off plant property.

The applicant shall account for the VOC emissions from this unit. Accounting of the VOC emissions shall be maintained on a monthly basis and, due to EPA policy for ozone nonattainment areas, shall be verifiable on a 24-hour basis. The annual VOC emissions used by Olympia 746 shall be submitted in an annual operating report (AOR) within sixty (60) days after the anniversary date of the operating permit once it is acquired and shall be submitted to the DER's St. Johns River District office. Cleaning solvents shall be accounted for and included in the AOR.

Compliance testing shall be conducted on the catalytic incinerator system to determine the VOC capture and transport efficiency and the VOC destruction efficiency. The compliance test method to demonstrate the destruction efficiency shall be EPA Method 25 in accordance with Appendix A, 40 CFR 60. The applicant proposes to demonstrate the capture efficiency by comparing the amount of VOC used during a test and the VOC concentration measured at the inlet of the incinerator over the same period of time. The compliance tests shall be conducted while the unit is operating at 100% of its rated production capacity. Future compliance testing shall be conducted while the unit is operating at 90-100% of the rated production capacity.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the facility are VOC. The following table will reflect the maximum allowable VOC emissions for the Olympia 746:

Table 4

Source	Maximum Allowable VOC Emissions		
	lb/hr	tons/month	TPY
Olympia 746	22.5	5.85	70.3
Clean-up Solvent	0.3	0.08	1.0

Note: Based on 520 hours/month and 6240 hours/year; minimum 70% VOC capture and transport efficiency and 95% VOC destruction efficiency; 26 reams of paper per hour rated production capacity.

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

IV. Conclusion

The installation of the Olympia 746 will allow the applicant to phase out the only uncontrolled flexographic printing and coating unit, Kidder I. With the addition of the Olympia 746 and the removal from service of the Kidder I, the total facility permitted VOC emissions becomes 151.9 TPY, which includes clean-up solvents of 6.7 TPY. However, Kidder I does not count against the new source allowance allotment (see Table 510.1, FAC Rule 17-2). Therefore, 102.3 tons (approximately 12%) of the Orange County's allotted new source allowance will be assigned to this facility. The modification net potential VOC emissions increase of 21.7 TPY will now be tracked for future facility modifications, which will allow an additional VOC emissions increase of 19.3 TPY before attaining the VOC significant emission rate of 40 TPY (Table 500-2, FAC Rule 17-2) and requiring review in accordance with FAC Rule 17-2.510(4), Preconstruction Review Requirements.

The net permitted VOC emissions increase from the proposed project should not cause any violation of Florida's ambient air quality standards.

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 48-117138
Expiration Date: March 31, 1987
County: Orange
Latitude/Longitude: 28° 24' 21"N
81° 23' 40"W/
Project: Olympia 746 Flexographic
Printing & Coating Unit & Associated
Catalytic Incinerator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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/installation of the Olympia Model 746 Central Impressions, which is a flexographic printing and coating unit with three associated natural gas dryers: a 0.8×10^6 Btu/hr - overhead dryer, a 0.5×10^6 Btu/hr overhead dryer, and a 0.15×10^6 Btu/hr tunnel oven. The dryers will operate at an idling level when not being used for production. The associated catalytic incinerator system will have a minimum 70% capture and transport efficiency and 95% destruction efficiency. The incinerator system will be custom designed by Etter Engineering Company, Inc., and consist of two identical 2500 CFM natural gas fired (0.4×10^6 Btu/hr) units utilizing an Eclipse model 80-AHO burner. The duct work and collection system will be designed and installed by Dec-E-Tech Industrial Design Engineering. The source emits volatile organic compounds and organic solvents (used for clean-up). The Olympia 746 will replace the existing Kidder I. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group No. 275 - Commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The source shall be as reflected in the permit application, plans documents, drawings and amendments, except as otherwise noted on pages 5-7 of the "Specific Conditions."

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and Jerome J. Guidry's cover letter dated March 3, 1986, and received March 7, 1986.
2. C. H. Fancy's letter dated April 1, 1986.
3. Jerome J. Guidry's letter dated April 24, 1986, and received April 28, 1986.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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 48-117138
Expiration Date: March 31, 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. The hours of operation shall not exceed 520 per month and 6240 annually.
- 2. The maximum allowable VOC (volatile organic compounds-organic solvents) emission limit shall not exceed 22.8 pounds per hour, 5.9 tons per month, and 71.3 tons per year (based on minimum 70% capture and transport efficiency and 95% destruction efficiency (oxidizes at least 95% of the VOC measured as total combustible carbon, to carbon dioxide and water) and includes 1 TPY clean-up solvent). The maximum rated production capacity is 26 reams per hour (based on 3000 square feet per ream).

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 1987

SPECIFIC CONDITIONS:

3. A compliance test shall be conducted to determine the control system's capture and transport efficiency and the incinerator's destruction efficiency. The compliance test shall be conducted while operating at 100% of the rated production capacity. All subsequent compliance test(s) can be conducted while the unit is operating at 90-100% of the rated production capacity.

o Destruction efficiency determination

The test method shall be EPA Method 25, Appendix A, 40 CFR 60, or other test method(s) approved by the department.

o Capture and transport efficiency determination

The procedure proposed by the permittee involves the determination and comparison of the amount of VOC used during the test and the VOC concentration measured at the inlet of the incinerator over the same period of time.

4. All compliance tests shall require written notification to the DER's St. Johns River District office fifteen (15) days prior to the day of a test. All test(s) results shall be submitted to the DER's St. Johns River District office forty-five (45) days after completion of the last test run.

5. Objectionable odors shall not be allowed off plant property.

6. The units are subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.

7. According to 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.

8. All VOC emissions shall be accounted for monthly and verifiable on a 24-hour basis, and should include clean-up solvents. The annual VOC use and emissions shall be submitted in an AOR (annual operating report) to the DER's St. Johns River District office within sixty (60) days after the anniversary date of the operating permit once acquired.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-117138
Expiration Date: March 31, 1987

SPECIFIC CONDITIONS:

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 St. Johns River 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)

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)

10. Upon the completion of the requirements contained in Specific Condition #9 or the receipt of an operation permit, whichever occurs first, the permittee will surrender to the department all air pollution permits associated with Kidder I.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 1



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

889 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801-1088
305/423-7275
TELEX 808435

March 3, 1986

Mr. Clair H. Fancy, P.E.
Deputy Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32031

RE: Orange County Air Pollution
Spiralkote, Inc.
Olympia 746 Flexographic Printing Press

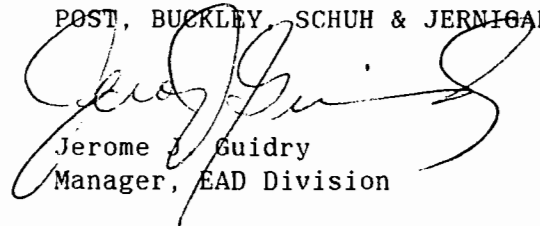
Dear Mr. Fancy:

Enclosed are three (3) copies of the above referenced application to construct an air pollution source along with the application fee of \$500. One (1) copy of the application has been forwarded to Mr. Tom Sawicki of the Orlando district office.

If you have any questions concerning this source, please contact Bruno Ferraro or me at (305) 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.



Jerome J. Guidry
Manager, EAD Division

JJG:BAF:daa

cc: Bob Kindorf
Tom Sawicki

Certified Mail No. P 034 188 328

DER

MAR 7 1986

BAQM

AC 48-117134

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOHNS RIVER DISTRICT

3319 MAGUIRE BOULEVARD SUITE 232 ORLANDO, FLORIDA 32803



BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

ALEX SENKEVICH DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Printing facility [X] New [] Existing
APPLICATION TYPE: [X] Construction [] Operation [] Modification
COMPANY NAME: Spiralkote, Inc. COUNTY: Orange

Identify the specific emission point source(s) addressed in this application (i.e. Lime Olympia 746 Flexographic printing press)
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 1200 Central Florida Parkway City Orlando (32809)
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. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Robert E. Kindorf

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

Date: 2-26-86 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 N. Orange Avenue, Orlando, FL 32801-1088
Mailing Address (Please Type)

Florida Registration No. 32589 Date: 3-4-86 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.

To construct an Olympia 746 Flexographic printing press to replace Kidder I printing press in existence at this facility. Emissions will be controlled by two (2) incinerators and will result in full compliance with 17-2 FAC.

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

Start of Construction June, 1986 Completion of Construction August, 1986

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.)

\$310,000.

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

None

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 5 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____

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? Yes
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		
Paper	None	N/A	519	1
Coating KJ 902	VOC	86	24.9	2
Coating NB 1061	VOC	66	17.7	3
Ink	VOC	74	46.2	4

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

1. Total Process Input Rate (lbs/hr): 607.8

2. Product Weight (lbs/hr): 540.5

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	22.5	70.3	17-2.640	22.5	67.3	209.9	5 & 6
			LAER				
			70% Capture				
			95% Destruction				

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)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Two 2500 CFM-Catalytic Incineration System	VOC	95%	N/A	Manufacturer Specifications
Custom built by Etter Engineering Co., Inc.				See stack test report enclosed

E. Fuels Natural gas used for all heating.

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Between color dryer	98 cf/hr	98 cf/hr	0.1035
Tunnel oven	138 cf/hr	138 cf/hr	0.145
#1 overhead dryer	773 cf/hr	773 cf/hr	0.814
#2 overhead dryer	480 cf/hr	480 cf/hr	0.506

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

Fuel Analysis:

Percent Sulfur: N/A Percent Ash: N/A

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 N/A Maximum _____

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

Some solvents are reclaimed by distillation. Waste solvents, coating and inks are shipped to Oldover Corporation, Green Cove Springs, to be burned in their boilers. This procedure is currently being used by this generator.

Two identical incinerators and stacks.

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

Stack Height: 30 ft. Stack Diameter: 1.26 ft.
 Gas Flow Rate: 2500 ACFM 1504 DSCFM Gas Exit Temperature: 400 °F.
 Water Vapor Content: 2 % Velocity: 33.33 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

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

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

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

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

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

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

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

E. Fuels Natural gas used for all heating.

Type (Be Specific)	Consumption ^o		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Incinerator #1	95 cf/hr	380 cf/hr	0.4
Incinerator #2	95 cf/hr	380 cf/hr	0.4

^oUnits: Natural Gas--MMCF/hr; Fuel Oil--gallons/hr; Coal, wood, refuse, other--lbs/hr.

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

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

Contaminant	Rate or Concentration

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

Contaminant

Rate or Concentration

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

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 unite 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

Spiralkote, Inc. is proposing to replace Kidder I (flexographic printing press), which emits 47.7 tons/year of uncontrolled VOC emissions, with a new Olympia Model 746 Central Impressions printing press, equipped with a VOC Collection system and two Etter Engineering catalytic incinerators to control VOC emissions. Emissions from this new press are estimated to be 70.3 tons/year of VOC based on 70% capture and 95% destruction as required by "LAER".

Kidder I will be phased completely out of production by December 1, 1986 or sooner if the new Olympia press is up to estimated production, in compliance with the FDER construction permit, and an operation permit has been issued by the State.

Total VOC emissions from this proposed press is estimated at 70.3 tons/yr. Kidder I is presently emitting 47.7 tons/yr VOC. By phasing Kidder I out of production, total plant wide-VOC emissions increase by 22.6 tons/yr with the installation of this Olympia 746 press.

This press will be equipped with two (2) catalytic incinerators to control VOC emissions. These identical incinerators are custom designed by Etter Engineering Company, Inc. and the duct work, collection system, and installation will be done by Dec-E-Tech Industrial Design Engineering. Each incinerator is a 2500 CFM natural gas fired system utilizing an Eclips Model 80-AHO burner. Heat recovery units associated with each incinerator supply heat to the preheat chamber of the incinerator reducing the amount of natural gas consumed.

Enclosed in this application are drawings of the duct work, flow diagram of the incinerator and a stack test report on the incinerator.

SUPPLEMENTAL REQUIREMENTS

Supplement 1: Process input rate was determined by the manufacturer's designed printing rate. The product weight is the weight of the printed paper less the solvent weight.

Supplement 2: Emissions were calculated from the solvent content of the inks and coatings assuming 70% capture of VOCs and 95% destruction.

Total control efficiency is:

$$0.7 \times 0.95 \times 100 = 66.5\%$$

Compliance will be demonstrated by an EPA Method 25 VOC stack test (or the latest approved method) with capture efficiency being determined by the amount of solvent being used during the test and the concentration of VOCs collected at the inlet of the incinerator.

Supplement 3-9: Attached.

VOC EMISSION SUMMARY

<u>Raw Material</u>	<u>Potential</u>		<u>Actual</u>	
	<u>lbs/hr</u>	<u>Tons/yr</u>	<u>lbs/hr</u>	<u>Tons/yr</u>
KJ 902	21.414	66.811	7.1736	22.381
NB 1061	11.682	36.447	3.9134	12.210
Ink	<u>34.188</u>	<u>106.66</u>	<u>11.452</u>	<u>35.733</u>
Total	67.284	209.918	22.539	70.324

EMISSION CALCULATIONS FOR VOLATILE ORGANIC COMPOUNDS

Comment: OLYMPIA 746 PRESS

Chemical name: COATING KJ 902

Chemical density: 0.6812 grams per cubic centimeter
 or 5.68 pounds per gallon
 VOC concentration: 4.8848 pounds per gallon
 or 86.0 per cent
 Usage rate: 4.3838 gallons per hour
 or 24.9 pounds per hour
 VOC control efficiency: 66.5 per cent

Operating schedule: 24 Hours per day
 5 Days per week
 52 Weeks per year

TOTAL 6240 Hours per year

$$\begin{aligned}
 \text{Potential emissions} &= (\text{Usage rate}) \times (\text{VOC Concentration}) \\
 &= (4.3838) \times (4.8848) \\
 &= 21.414 \text{ lb per hr} \times 6240 \text{ hr per year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 66.811 \text{ Tons per year}
 \end{aligned}$$

$$\begin{aligned}
 \text{Maximum emissions} &= \text{Potential emissions} \times (1 - \text{Efficiency}) \\
 &= (21.414) \times (1 - 0.665) \\
 &= 7.1736 \text{ pounds per hour}
 \end{aligned}$$

$$\begin{aligned}
 \text{Actual emissions} &= \text{Maximum emissions} \times \text{Operating schedule} \\
 &= 7.1736 \text{ lb/hr} \times 6240 \text{ hrs/year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 22.381 \text{ tons per year}
 \end{aligned}$$

EMISSION CALCULATIONS FOR VOLATILE ORGANIC COMPOUNDS

Comment: OLYMPIA 746 PRESS

Chemical name: COATING NB 1061

Chemical density: 0.6048 grams per cubic centimeter
 or 5.0427 pounds per gallon
 VOC concentration: 3.3281 pounds per gallon
 or 66.0 per cent
 Usage rate: 3.5100 gallons per hour
 or 17.7 pounds per hour
 VOC control efficiency: 66.5 per cent

Operating shedule: 24 Hours per day
 5 Days per week
 52 Weeks per year

TOTAL 6240 Hours per year

$$\begin{aligned}
 \text{Potential emissions} &= (\text{Usage rate}) \times (\text{VOC Concentration}) \\
 &= (3.5100) \times (3.3281) \\
 &= 11.682 \text{ lb per hr} \times 6240 \text{ hr per year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 36.447 \text{ Tons per year}
 \end{aligned}$$

$$\begin{aligned}
 \text{Maximum emissions} &= \text{Potential emissions} \times (1 - \text{Efficiency}) \\
 &= (11.682) \times (1 - 0.665) \\
 &= 3.9134 \text{ pounds per hour}
 \end{aligned}$$

$$\begin{aligned}
 \text{Actual emissions} &= \text{Maximum emissions} \times \text{Operating schedule} \\
 &= 3.9134 \text{ lb/hr} \times 6240 \text{ hrs/year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 12.210 \text{ tons per year}
 \end{aligned}$$

01-Jan-80

EMISSION CALCULATIONS FOR VOLATILE ORGANIC COMPOUNDS

Comment: OLYMPIA 746 PRESS

Chemical name: INK

Chemical density: 0.9021 grams per cubic centimeter
 or 7.5213 pounds per gallon
 VOC concentration: 5.5657 pounds per gallon
 or 74.0 per cent
 Usage rate: 6.1425 gallons per hour
 or 46.2 pounds per hour
 VOC control efficiency: 66.5 per cent

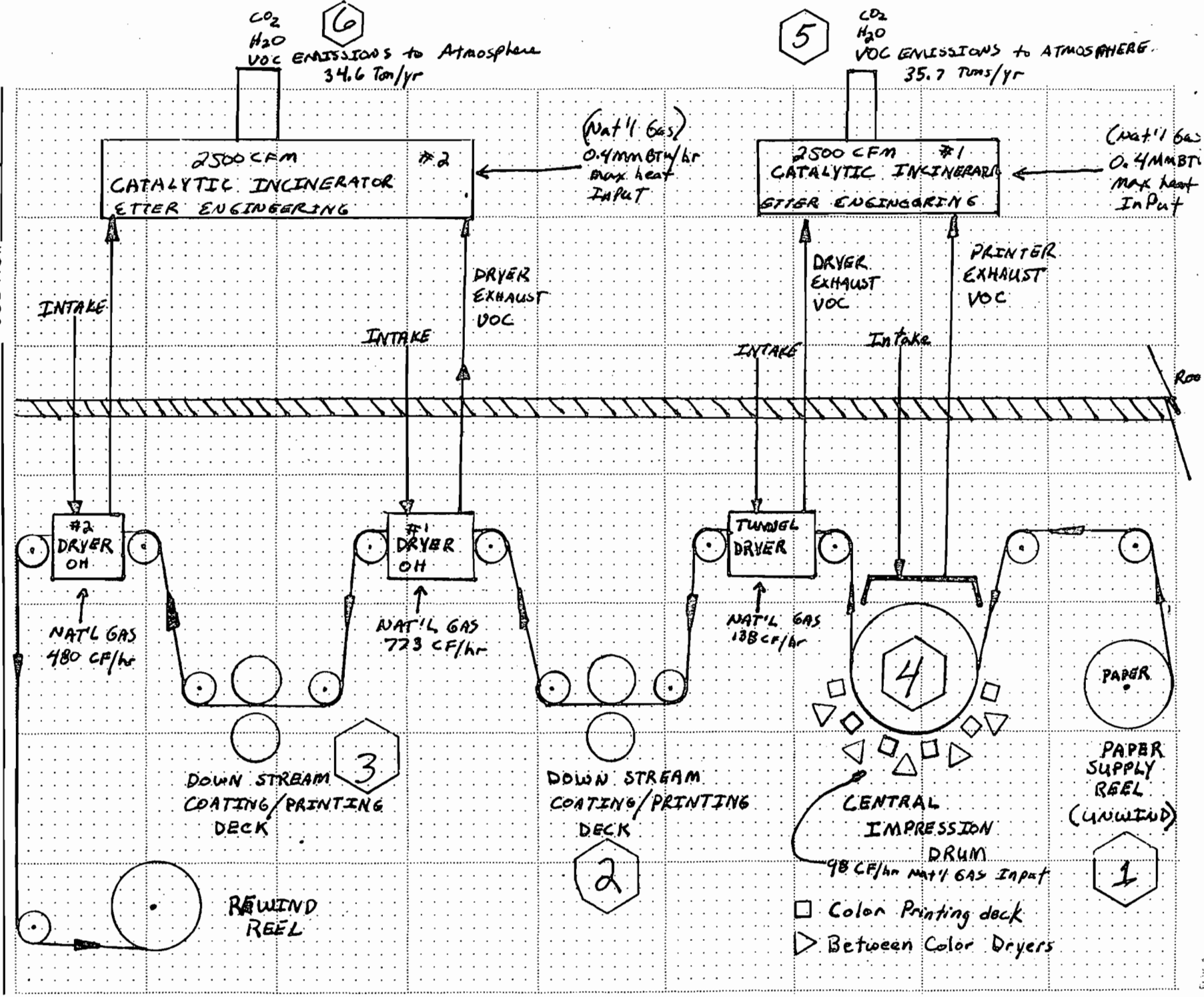
Operating shedule: 24 Hours per day
 5 Days per week
 52 Weeks per year

TOTAL 6240 Hours per year

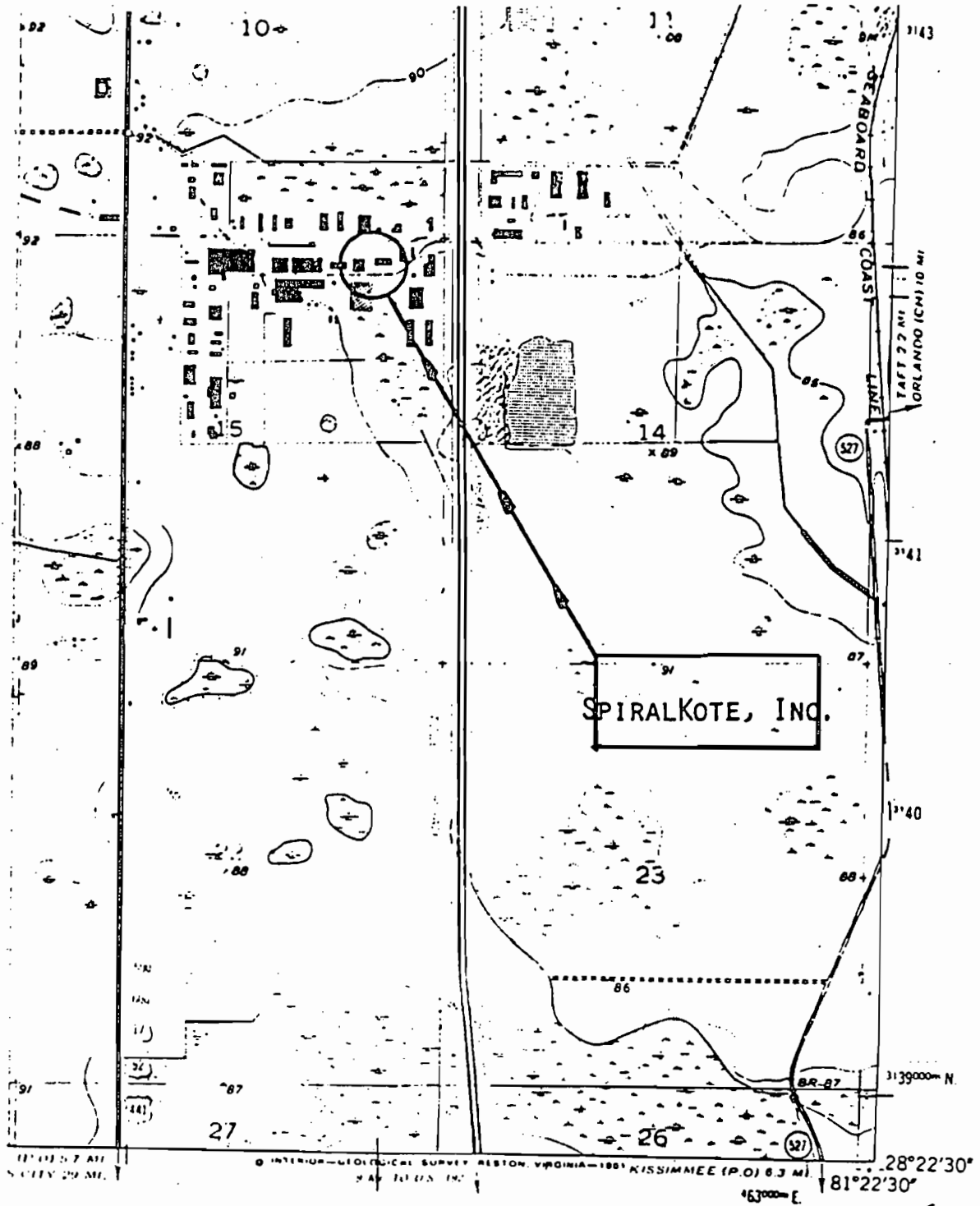
$$\begin{aligned}
 \text{Potential emissions} &= (\text{Usage rate}) \times (\text{VOC Concentration}) \\
 &= (6.1425) \times (5.5657) \\
 &= 34.188 \text{ lb per hr} \times 6240 \text{ hr per year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 106.66 \text{ Tons per year}
 \end{aligned}$$

$$\begin{aligned}
 \text{Maximum emissions} &= \text{Potential emissions} \times (1 - \text{Efficiency}) \\
 &= (34.188) \times (1 - 0.665) \\
 &= 11.452 \text{ pounds per hour}
 \end{aligned}$$

$$\begin{aligned}
 \text{Actual emissions} &= \text{Maximum emissions} \times \text{Operating schedule} \\
 &= 11.452 \text{ lb/hr} \times 6240 \text{ hrs/year} \\
 &\quad \times (1 \text{ ton} / 2000 \text{ pounds}) \\
 &= 35.733 \text{ tons per year}
 \end{aligned}$$



SITE LOCATION MAP -- U.S.G.S. MAP SECTION
SPIRALKOTE, INC.



SPIRALKOTE, INC.

11° 01' 57" AL
S CITY 29 MI.

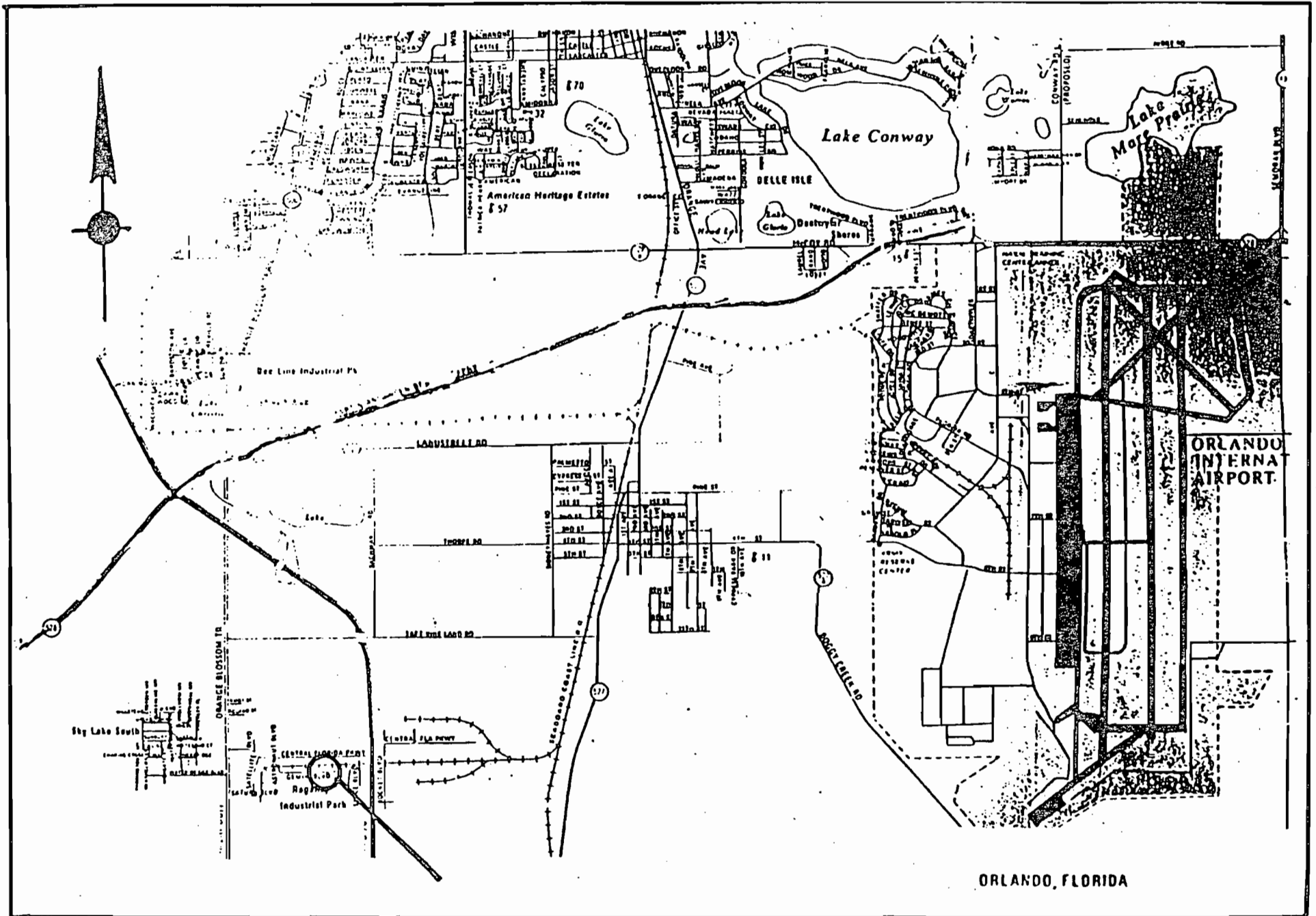
© INTERIOR-GEOLOGICAL SURVEY RESTON, VIRGINIA-1981 KISSIMEE (P.O.) 6.3 MI.
24 10 US IN.

28°22'30"
181°22'30"

ROAD CLASSIFICATION

157.05

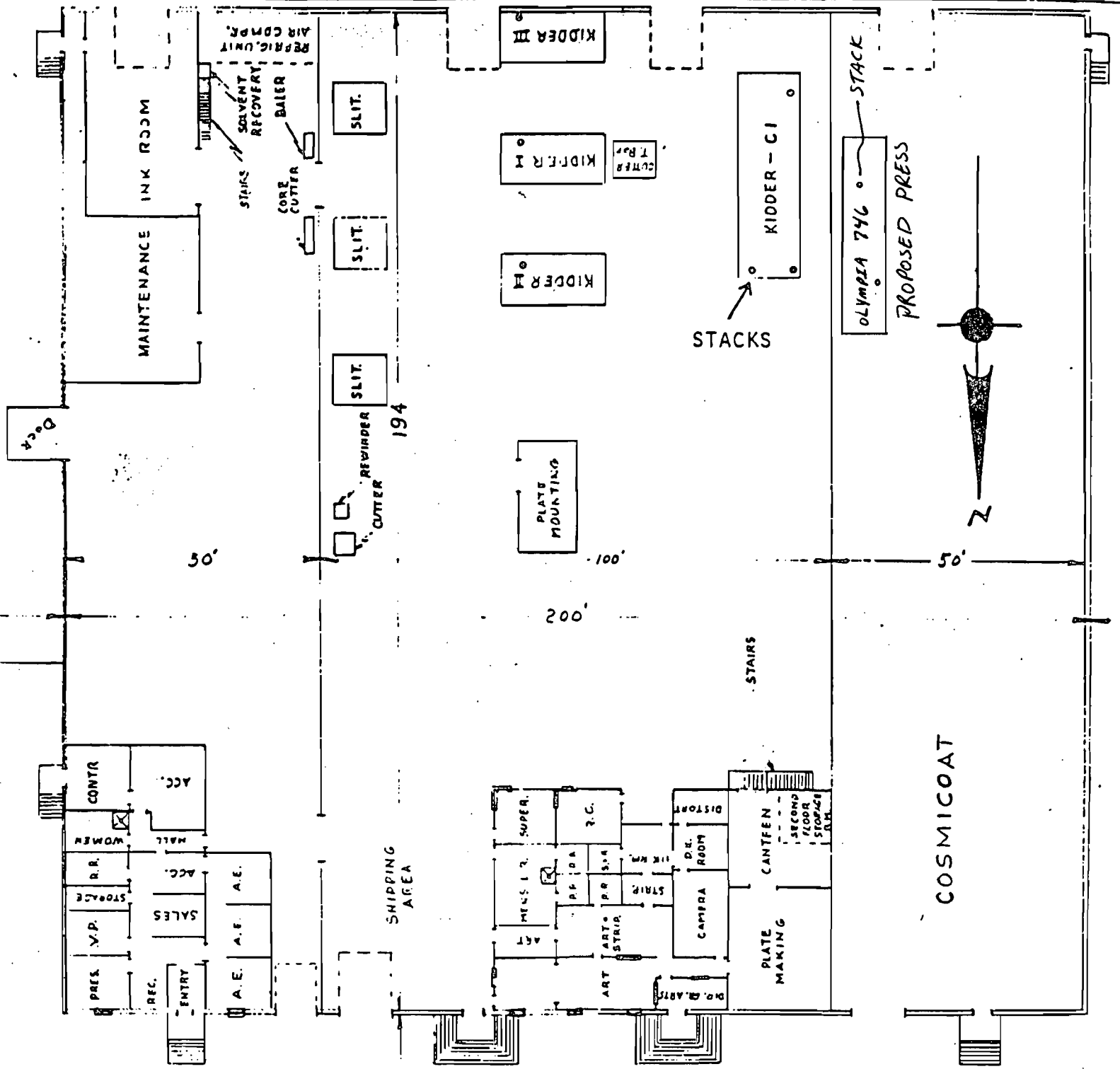
BEST AVAILABLE COPY



ORLANDO, FLORIDA

SPIRALKOTE, INC. GENERAL LOCATION MAP

PLOT PLAN OF FACILITY SPIRALKOTE, INC.



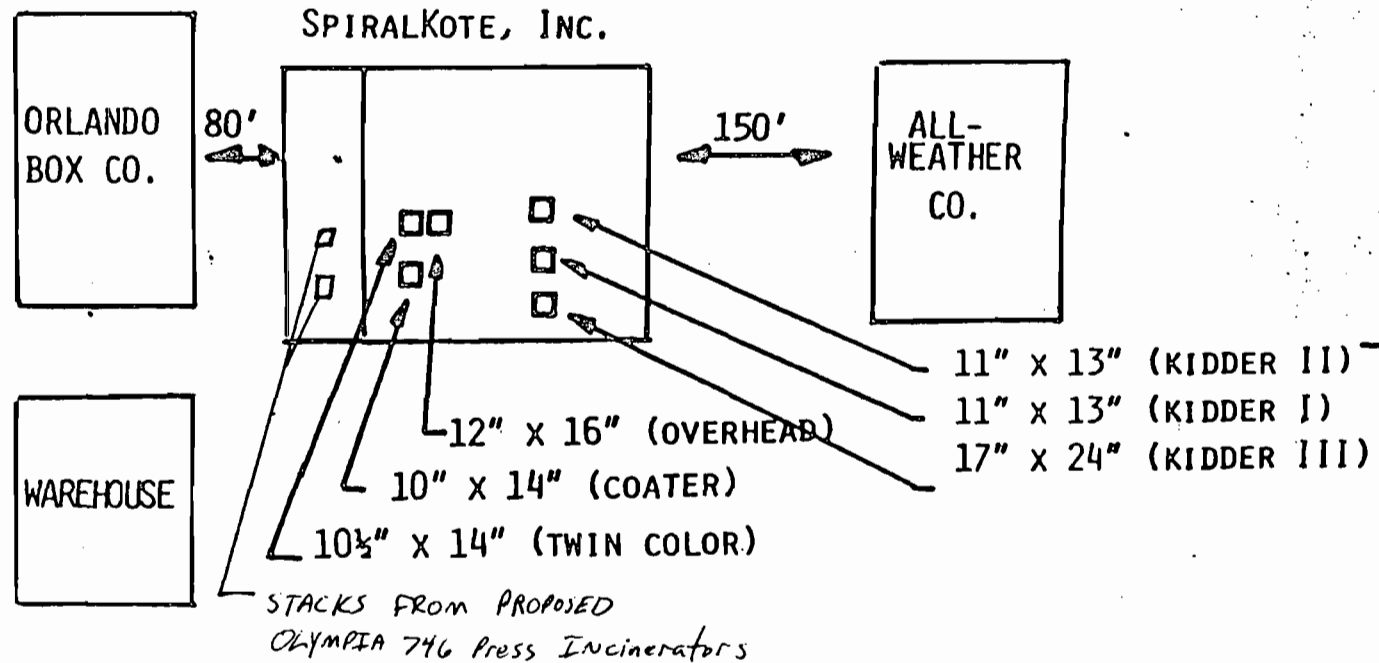
(FRONTS ON CENTRAL FLORIDA PARKWAY)

PLOT PLAN OF AREA/ROOF SKETCH SPIRALKOTE, INC.

LOCATED IN THE
REGENCY INDUSTRIAL PARK



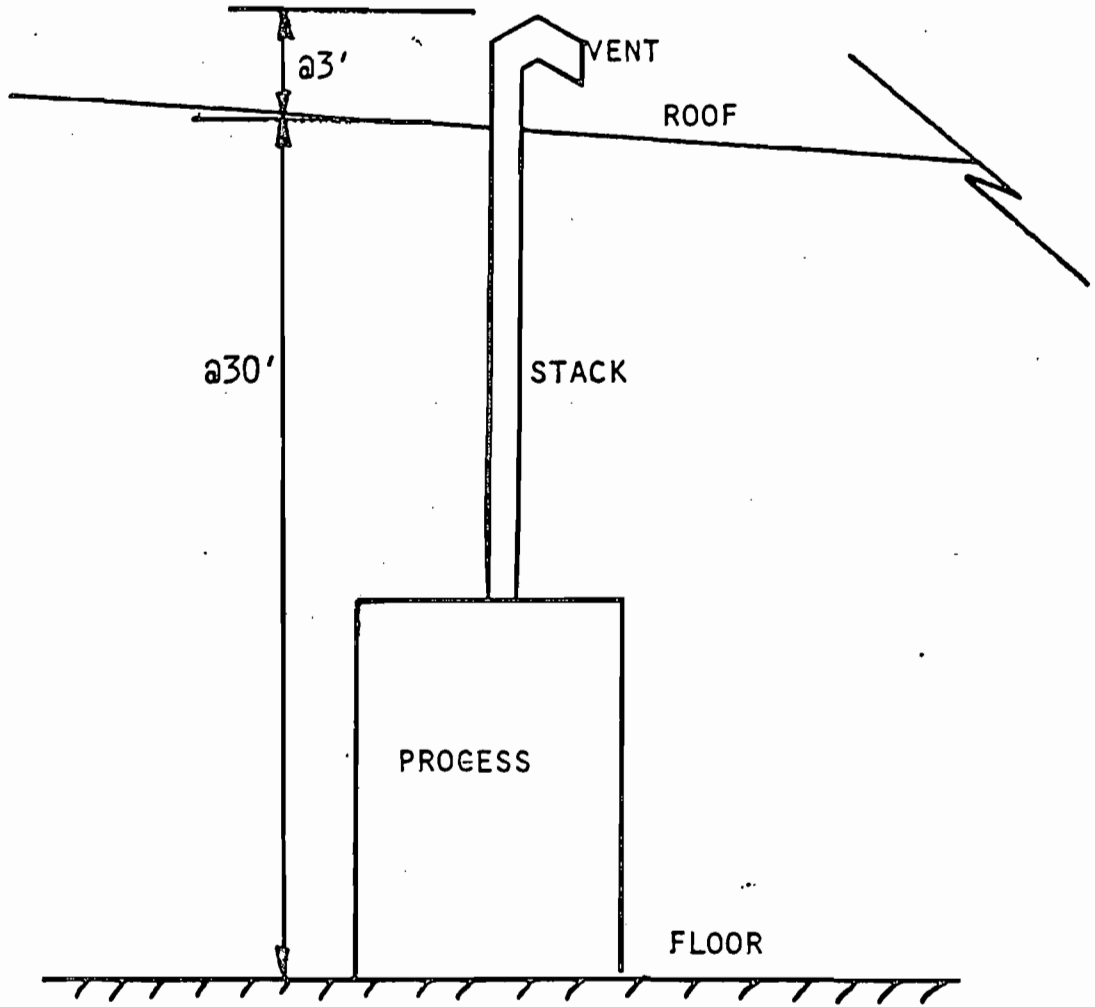
CENTRAL FLORIDA PARKWAY



NOT TO SCALE

TYPICAL SKETCH OF ROOF EXHAUST

SPIRALKOTE, INC.





ETTER ENGINEERING COMPANY, INC.

4 KIDDER ROAD • CHELMSFORD, MASSACHUSETTS 01824
TELEPHONE: (617) 256-0980

January 8, 1985

REC-1

1985

Fleming Packaging Corp.
Spiralkote, Inc.
1200 Central Florida Pkwy.
Orlando, FL 32809

Attention: Robert Kindorf--Vice-President, Production

Reference: Catalytic Reactor Test

Dear Robert,

Enclosed is a copy of the test report done by Affiliated Environmental Services, Inc. of Sandusky, Ohio for Pillar Corporation at their C.B. Henschel Company installation in New Berlin, Wisconsin. They applied the Method 25 EPA stack test for Volatile Organic Compounds to the Pillar 15,000SCFM catalytic reactor. The reactor was connected to the 7 gravure laminating and coating machines employing the following solvents: ethyl acetate, I.P. acetate, isopropanol, and xyol alcohol. The sampling equipment and method was as follows:

- a) VOC test consisted of simultaneous sampling at the "inlet" and "outlet" for 60 minutes
- b) the VOC was sampled using two sets of EPA method 25 type
- c) Byron model 90 sample collection units, consisting of probes, heavy hydrocarbon traps, pump mass flow rate/integrator and Tedlar bag
- d) the heavy hydrocarbon trap sample is treated using Byron model 75 hydrocarbon converter
- e) introduced into a Byron 401 analyzer gas chromatograph (flame ionization detector)

The results of the test are as follows:

- a) at a preset inlet air temperature of 450°F, the efficiency is 98.8%
- b) at a preset inlet air temperature of 525°F, the efficiency is 98.9%
- c) at a preset inlet air temperature of 575°F, the efficiency is 99.3%



ETTER ENGINEERING COMPANY, INC.

January 8, 1985

Page 2

Catalytic Reactor Test

As you can see, the BTU/hr. required for pre-heats of 575°F versus 450°F doesn't derive any significant benefit in terms of efficiency i.e. 98.8% versus 99.3%. Therefore, a pre-heat of 450°F at 98.8% efficiency is more than adequate to meet EPA standards.

Further information on our design modifications and test results at Union Industries will be forthcoming as information is made available.

If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger Decelles".

Roger Decelles
Vice-President, Manufacturing

Enclosures

RED/ef

AFFILIATED ENVIRONMENTAL SERVICES, inc.

219 FREMONT AVENUE, SANDUSKY, OHIO 44870 (419) 627-1976

REPORT TO PILLER CORP.

ON

STACK V.O.C. SAMPLES
COLLECTED AT
C.B. HENSCHEL
15805 OVERLAND DR.
NEW BERLIN, WI

SUBMITTED BY

A.E. SERVICES, INC.
219 FREMONT AVENUE
SANDUSKY, OHIO 44870

DATE OF TESTING: Nov. 14, 1984

DATE OF REPORT: Nov. 23, 1984


FIELD TEST ENGINEER

Affiliated Environmental Services, Inc.

I. INTRODUCTION

This report contains the results of Volatile Organic Carbon (VOC) testing performed on the inlet gases and the outlet gases from a 15,000 cfm Pillar catalytic unit installed at the C.B. Henschel plant in New Berlin Wisc. This test was reviewed by and witnessed by the Wisc. State and the Federal EPA. Mr. Dick Dalton, the EPA Region V VOC expert, was present as was Mr. Frank Ecmann of Region V to witness the test. The operations tested at C.B. Henschel consists of printing and lamination. The facility has 6 out of the 7 lines (#6 not operational yet) available however only 4 or 5 lines are normally in use on any given day. On the day of the test lines 2,4,5 and 7 were in use during all 3 tests. Line 1 was in operation during the 2nd test only. Line 1 was a waterbase coating and should not produce any significant V.O.C. A summary of the make up of the coating for each line is attached to this report. Testing was only performed during full production (no testing during breaks or at lunch time. The VOC's from each line are captured by a series of hoods and exhaust take offs. Each line has its own local exhaust system (separate exhaust units) which then feed to a common plenum: The gases in this plenum next go to a gas fired preheat zone then to the catalytic unit.

Affiliated Environmental Services, Inc.

The effluent from the catalytic unit is used (via counter flow heat exchange) to heat the plant and air to the lines (presses). A portion of this effluent is vented to atmosphere with the balance returning through the plenum to the preheat then the catalytic unit. The two test points were: inlet to the preheat and the outlet from the catalytic (plenum from which effluent is diverted to atmosphere or through the heat exchangers for the plant). Three sets of V.O.C. tests were performed. Each set consisted of simultaneous sampling at the "inlet" and "outlet" for 60 minutes. Test I was ran with the temperature of the gas to the catalytic incinerator (after preheat) at 450°F, Test II at 525°F and Test III at 575°F. This temperature, the temperature after the incinerator, the temperatures at each sample point and a listing of lines with exhausts fans on was monitored every 5 minutes (sheets attached). The V.O.C. was sampled using two sets of method 25 type stack trains. This consists of a Byron Model 90 sample collection unit which is made up of a probe, a heavy hydrocarbon trap, the pump and mass flow rate/integrator, and a Tedlar Bag. The sample is drawn into the probe and the heavy hydrocarbons are removed by the trap and the flow rate and volume are monitored by a mass flow meter. The light hydrocarbons and CO and CO₂ are collected in the Tedlar Bag. Analysis of the sample is performed using a Byron Model 401 analyzer. The Tedlar Bag fraction of the sample is analyzed directly on this analyzer. The heavy hydrocarbon trap requires treatment first using a Byron Model 75 heavy hydrocarbon converter. This converter

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first removes at high temperature the hydrocarbons from the trap then converts the hydrocarbons to CO₂ which is then introduced into the 401 analyzer. The 401 analyzer is a gas chromatograph (flame ionization detector) system specially equipped to separate the gas introduced into the following components; CO, CO₂, CH₄, C₂'s and NMHC (none methane hydrocarbons). After separation all the individual components go through a catalytic oxidizer (converted to CO₂) then reduced to CH₄ by a catalytic reducer then they are measured by the FID as methane. Since all components follow through the same path (oxidizer/reducer/detector) greater system accuracy is assured. All measurements made in the detector are made on CH₄ which is precisely proportional to the carbon content of the original hydrocarbon. The unit is calibrated using a minimum of two gases. The first is a 4 component mixture of CH₄, CO, CO₂ and propane. This mixture checks out the catalytic oxidizer and reducer plus the condition of the gas chromatograph columns. It also is used to verify the calibration of each component (CH₄, CO, CO₂ and NMHC). The second gas is a special zero gas that contains less than 0.1 ppm hydrocarbon. On the date of this test three additional gas mixtures were used as quality control checks. The first QC gas was a mixture of CO₂ in zero gas, the second QC gas was CH₄ in zero gas, and the third gas was a different concentration of the same 4 components as in the primary calibration mixture. All the calibration gases and the QC gases were in specification (1% of scale). Two sets of

Affiliated Environmental Services, Inc.

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Affiliated Environmental Services, Inc.

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Affiliated Environmental Services, Inc.

organic solvents were taken during VOC test II using charcoal absorption tubes which were ran (FID gas chromatograph/CS₂ desorbition) to look for new organics formed by the catalytic incinerator; none were found. In addition 2 thirty minute samples were taken at the "outlet" point during V.O.C. test II to determine concentrations of formaldehyde and other low molecular weight (C₁-C₅) aldehydes. The method used was Inter Society Committee 110; collection in 1% NaHSO₃ solution. The results were as follows (ppm):

COMPOUND	Run A	Run B
Formaldehyde	.26	.22
Acrolein	<.02	<.02
C ₂ -C ₅	<.05	<.05

The formaldehyde method is subject to some inter ferences. In order to see if this was a problem a test was ran simultaneously with Run A using a "spiked" solution that would yield 0.54 ppm formaldehyde if no inter ference. It resulted in 0.59 ppm.

Affiliated Environmental Services, Inc.

II. V.O.C. TEST RESULTS

The V.O.C. test results are presented in Tables I, II and III.

The incinerator efficiency was:

Test I	98.8%
Test II	98.9%
Test III	99.3%

III. EMISSIONS

During Test III the volume of air being exhausted from the system was measured at a 2' x 6' opening using an Alnor series 6000 velometer with a pitot probe. The opening was divided into 12 equal areas and the meter reading (ft/min) recorded. The top 4 openings were all less than 200; the 2nd row of 4 were 850, 600, 250 and 200 with the bottom row of 4 being 1600, 1550, 1450 and 1200. After correcting for temperature this results in an emission rate of 9950 cfm. Based on an emission concentration of 6.4 ppm of NMHC (as methane) this results in an emission of 0.12 lb/hr.

Affiliated Environmental Services, Inc.

TABLE I

SUMMARY OF TEST DATA OBTAINED
DURING TEST I
PRESET TEMPERATURE 450°F

	Inlet	Outlet
Sampling Date	11-14-84	11-14-84
Barometric Pressure	29.88	29.88
Time Sampled	1044-1145	1046-1147
Volume (Liters)	6.094	7.294
<u>Concentration of Gases in ppm</u>		
Carbon Monoxide	17	26
Carbon Dioxide	425	990
Methane	3	2
NMHC (1)	739	9.2
NMHC = non-methane hydrocarbon		

TABLE II

SUMMARY OF TEST DATA OBTAINED
DURING TEST II
PRESET TEMPERATURE 525°F

	Inlet	Outlet
Sampling Date	11-14-84	11-14-84
Barometric Pressure	29.88	29.88
Time Sampled	1324-1424	1325-1425
Volume (Liters)	6.318	7.304
<u>Concentration of Gases in ppm</u>		
Carbon Monoxide	22	31
Carbon Dioxide	390	1125
Methane	3	3
NMHC (1)	760	8.0
NMHC = non-methane hydrocarbon		

(1) NMHC is reported in ppm as methane

Affiliated Environmental Services, Inc.

TABLE III

SUMMARY OF TEST DATA OBTAINED
DURING TEST III
PRESET TEMPERATURE 575°F

	Inlet	Outlet
Sampling Date	11-14-84	11-14-84
Barometric Pressure	29.88	29.88
Time Sampled	1532-1632	1534-1634
Volume (Liters)	6.311	7.528
<u>Concentration of Gases in ppm</u>		
Carbon Monoxide	24	27
Carbon Dioxide	460	1680
Methane	2	3
NMHC (1)	872	6.4
NMHC = non-methane hydrocarbon		

(1) NMHC is reported in ppm as methane

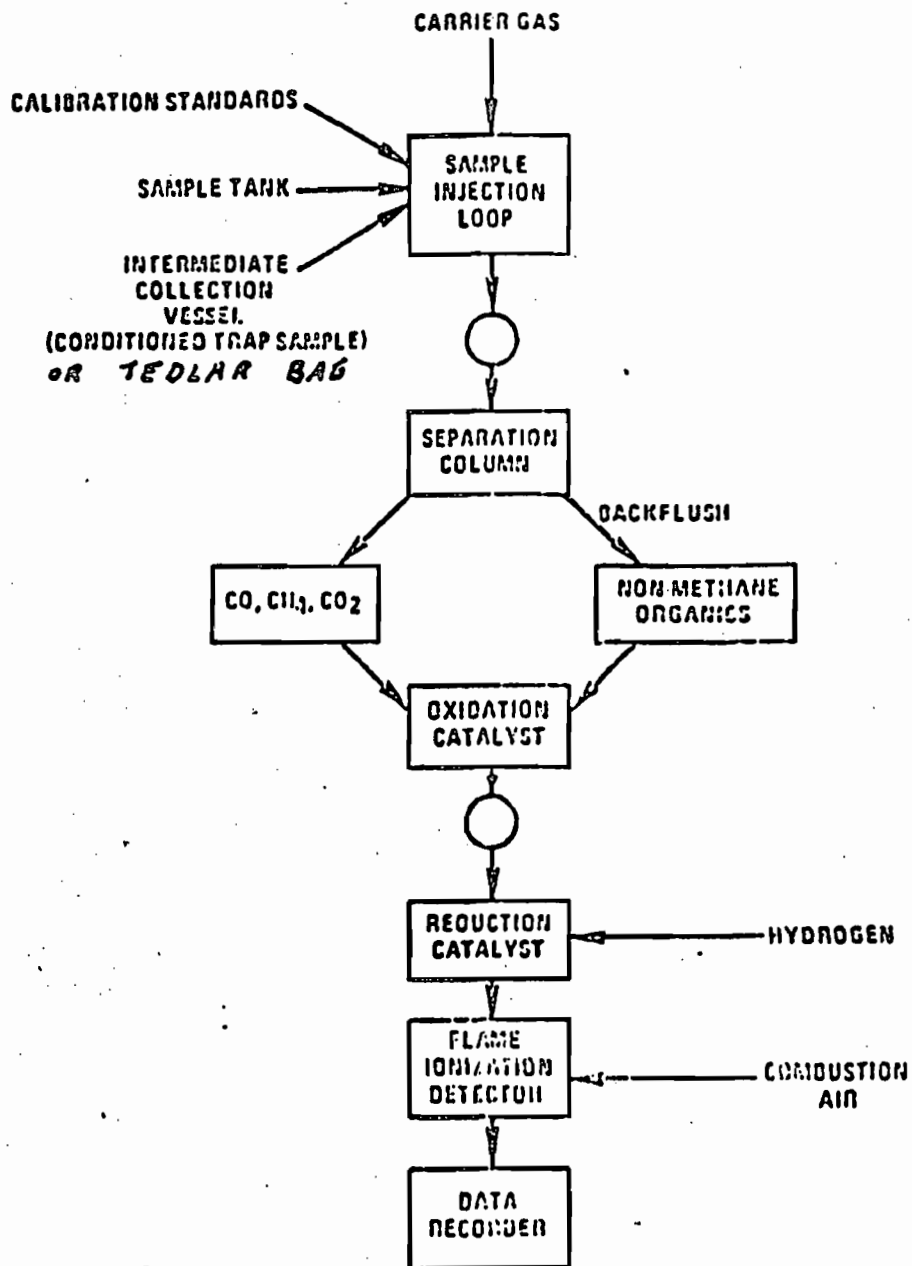


Figure 2. Simplified schematic of non-methane organic (NMO) analyzer

COPTIVE - KUN 11/14/84 WEING EPA 1257

LINE #1 - WATERBASE COATING - NO SOLVENT

LINE #2 - #8760 - 1/2 GAL OF MIX PER HOUR

4 GAL OF MIX = 1/2 GAL I.P. ALCOHOL
 1/2 GAL NAPHTHA-VMF
 3 GAL 8760 BASE

8760 BASE = 8.0 ^{lbs} PER GALLON
 42% VOC BY WEIGHT

THE 42% VOC ARE IN THESE

PROPORTIONS:

ALCOHOL 45%

AROMATIC 9%

VMF NAPHTHA 46%

LINE #3 UV LACQUER - NO SOLVENT

LINE #4 #1 PC-15 COATING - 3½ GAL MIX PER HOUR

5 GAL OF MIX = 1 GAL I.P. ALCOHOL
4 GAL PC-15 BASE

PC-15 BASE = 8.1 LBS. PER GALLON
35% VOC BY WEIGHT

THE VOLATILES INCLUDE: ISOPROPANOL
VMF NAPHTHA
XYLOL

(NO PROPORTION AVAILABLE -
MFG - PROPRIETARY)

LINE #5 76FS93 ADHESIVE - 4 GAL MIX PER HOUR

5 GAL MIX = 3 GAL I.P. ACETATE
2 GAL 76FS93 BASE

76FS93 BASE = 8.8 LBS PER GALLON
40% VOC BY WEIGHT

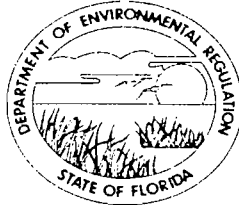
THE VOLATILES IN 76FS93 IS
100% ETHYL ACETATE

LINE #7 76FS93 ADHESIVE - 12 GAL MIX PER HOUR
(SAME MIX AS LINE #5)

ATTACHMENT 2

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

April 1, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Kindorf:

RE: Completeness Review of an Application to Construct
Air Pollution Source: No. AC 48-117138

The department received the above referenced application package and Mr. Jerome J. Guidry's cover letter on March 7, 1986. Technical review of the application package has been completed and the bureau deems it incomplete. Therefore, the following information, including all assumptions, calculations and reference documents, will have to be submitted to the department before the status can, again, be ascertained:

- o If there is any information that you want the department to consider proprietary pursuant to Section 403.11, Florida Statutes, please document and submit it as a separate addendum.
- o What is the projected daily, monthly, and annual VOC/organic solvent(s) usage for clean-up for this source and its operation.
- o Since the flexographic printing press Kidder I (facility I.D.) will be removed from service, document and submit its annual actual VOC/organic solvent(s) emissions for the last 3 years, which should include the projected usage of solvent(s) used for clean-up purposes. Present the two values separately.

Mr. Robert E. Kindorf
Page Two
April 1, 1986

If there are any questions, please call Bruce Mitchell at
(904)488-1344 or write to me at the above address.

Sincerely,

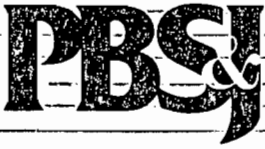
for 

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

CHF/BM/s

cc: Tom Sawicki
Jerome J. Guidry

ATTACHMENT 3



POST, BUCKLEY, SCHUH & JERNIGAN, INC.

889 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801-1088
305/423-7275
TELEX 808435

DER

APR 28 1986

BAQM

April 24, 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: Response to completeness review
Spiralkote construction permit application
No. AC 48-117138

Dear Mr. Fancy:

This letter is in response to your April 1, 1986, completeness review to Mr. Robert E. Kindorf of Spiralkote, Inc., Orlando, Florida. We have researched your requests and the following represents Spiralkote's best estimates, based on historic data for the past three (3) years.

Item 1: The only information Spiralkote wishes to remain proprietary is technical details of the Olympia 746 press including drawings and production information.

Item 2: The projected solvent(s) usage for clean-up for this source and its operation has been extrapolated from historic data (based on solvent purchased versus quantity of hazardous solvents shipped out). The yearly estimate represents a conservative projection of solvent usage and the daily and monthly usage rates are based on this rate:

yearly = 2400 gal or 19,200 lbs
based on 8 lbs/gal

weekly = 46.15 gal or 369.20 lbs
daily = 9.23 gal or 73.84 lbs

Due to the advanced technology of the Olympia 746 press, clean-up solvent usage is projected to be reduced to half of the current usage. Also, Spiralkote is investigating new low solvent soaps to clean the floors around the press.

Mr. C. H. Fancy, P.E.
April 24, 1986
Page 2

It is conservatively estimated that no more than 10% of the solvent used in clean-up volatilizes to the atmosphere. This estimate is based on the volume of solvent used in clean-up versus the quantity collected as hazardous waste. Therefore, projected yearly emissions are:

$$19,200 \text{ lbs solvent/year} \times 0.1 = 1920 \text{ lbs VOC/yr}$$

$$1920 \text{ lbs} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 0.96 \text{ or } 1 \text{ ton/yr}$$

Item 3: Kidder I solvent usage for clean-up purposes has been estimated from this historic data mentioned above. Total solvent usage for each of the last three years has been determined and divided by the number of presses at the facility (4). It is not possible to determine solvent usage for individual presses based on Spiralkote's records. The actual VOC emissions from the printing operation have also been determined.

Clean-up Solvent Usage & Emissions

<u>Year</u>	<u>Solvent Usage</u>	<u>Yearly Emissions from clean-up solvents (10% of usage)</u>
1983	4250 gal or 34,000 lbs (based on 8 lbs/gal)	3400 lbs or 1.7 tons
1984	4710 gal or 37,680 lbs	3768 lbs or 1.88 tons
1985	4625 or 37,000 lbs	3700 lbs or 1.85 tons

Mr. C. H. Fancy, P.E.
April 24, 1986
Page 3

Actual emissions are based on the production history for the last three years. The permitted emission limit of 47.7 tons/year corresponds to a production rate of 100%. Since Kidder I has operated at 100 percent capacity for the last three years, then emissions from Kidder I are estimated to be 47.7 tons per year for those years. Therefore, total combined emissions for clean-up solvents and production are as follows:

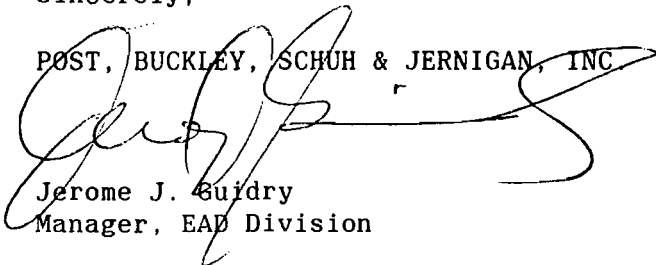
1983 emissions = $47.7 + 1.7 = 49.4$ tons/yr
1984 emissions = $47.7 + 1.88 = 49.6$ tons/yr
1985 emissions = $47.7 + 1.85 = 49.6$ tons/yr

Kidder I has operated at its permitted capacity for the last three years. The Olympia 746 press is expected to replace the Kidder I while increasing overall production. The Olympia production rate is estimated at 26 reams of paper per hour or more than twice that of Kidder I.

This should satisfy the requirements of your completeness review so that the Department may proceed with the permitting process for this source. If you have any additional questions concerning Spiralkote, please call me or Bruno Ferraro at (305) 423-7275.

Sincerely,

POST, BUCKLEY, SCHUH & JERNIGAN, INC



Jerome J. Guidry
Manager, EAD Division

JJG:BAF:daa

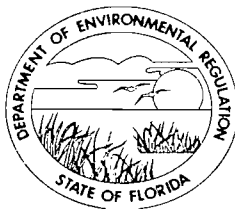
cc: Bob Kindorf
St. Johns River District office 4-29-86 RM
Certified Mail No. P 387 903 506

21-023.00

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

March 20, 1986

Enclosed are Permit Numbers AC 48-82733, AC 48-82735, AC 48-82736, and AC 48-82738 to Spiralkote, Inc. which authorize the construction of four flexographic printing and coating units at your existing facility in Orange County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

Any Party to these permits has the right to seek judicial review of the permits 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 32301; 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 these permits are filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:
Jerome J. Guidry, P.E.
Tom Sawicki, SJRD
Jeff Pallas, EPA Region IV

Final Determination

Spiralkote Inc.
Orange County
Orlando, Florida

Permit Numbers:

AC 48-82733
82735
82736
82738

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

March 19, 1986

Final Determination

The construction applications have been reviewed by the department. Public notice of the department's intent to issue was published in The Orlando Sentinel on February 11, 1986. The technical evaluation and preliminary determination were available for public inspection at the DER's St. Johns River District office and Bureau of Air Quality Management office.

There were no comments received on the proposed action. Therefore, it is recommended that the proposed construction permits be issued as drafted.

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

State of Florida)
COUNTY OF ORANGE) SS.



ADVERTISING CHARGE \$87.23

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 Proposed Agency Action in the matter of
Permit to Spiralkote, Inc.
in the _____ Court,
was published in said newspaper in the issues of _____
February 11, 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.

Catherine Deering
Sworn to and subscribed before me this 12th day

of February A.D., 19 86
Virginia H. Hallingworth
Notary Public, State of Florida at _____
My Commission Expires July 13, 1989
Bonded Thru Brown & Brown, Inc. FORM NO. AD-262

State of Florida
Department of Environmental
Regulation

Notice of Proposed Agency
Action on Permit Applications

The Department of Environ-
mental Regulation gives notice
of its intent to issue permits to
Spiralkote, Inc. for four (4) op-
erating flexographic printing
and coating units with associ-
ated natural gas heaters and
for the pollutant emitting
sources that make up the Cyril
Plate Room operations at the
applicant's existing facility in
Orlando, Orange County, Flori-
da. A determination of lowest
achievable emission rate
(LAER) was required.

Persons whose substantial
interests are affected by the
Department's proposed permit-
ting decision may petition for
an administrative proceeding
(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 Office of General Counsel
of the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, Flori-
da 32301, within fourteen (14)
days of publication of this no-
tice. Failure to file a request for
hearing within this time period
shall constitute a waiver of any
right such person may have to
request an administrative de-
termination (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 Model Rule 28-
5.207, Florida Administrative
Code, at least five (5) days be-
fore the final hearing and be
filed with the hearing officer if
one has been assigned at the
Division of Administrative Hear-
ings, Department of Adminis-
tration, 2009 Apatachee Park-
way, Tallahassee, Florida
32301. If no hearing officer has
been assigned, the petition is
to be filed with the Depart-
ment's Office of General Coun-
sel, 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 re-
quest a hearing under Section
120.57, Florida Statutes.

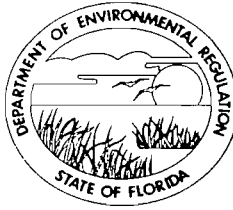
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Dept. of Environmental
Regulation
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 30 days of the publica-
tion of this notice will be con-
sidered in the department's fi-
nal determination.
CL-149 Feb. 11, 1986

986181986
DAQM

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 48-82738
Expiration Date: August 31, 1986
County: Orange
Latitude/Longitude: 28° 33' 08"N/
81° 21' 05"W
Project: Cyrel Plate Room

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 permitting of four air pollution sources that make-up the Cyrel Plate Room operation at the permittee's existing facility. The tank washout, solvent recovery still (65% projected recovery efficiency), and dryer (electrically heated) emit volatile organic compounds and the finishing tank emits hydrochloric acid fumes through stacks in the roof. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group Number 275 - Commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The sources shall be as reflected in the permit applications, plans documents, drawings and amendments, except as otherwise noted on pages 5-8 of the "Specific Conditions."

Attachments:

1. List of Attachments.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82738
Expiration Date: August 31, 1986

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 48-82738
Expiration Date: August 31, 1986

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 48-82738
Expiration Date: August 31, 1986

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.

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 48-82738
Expiration Date: August 31, 1986

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:

A. Finishing Tank

1. The projected annual pollutant potential emissions are:
- o HCl-248.0 lb/yr
2. The projected annual hours of operation are 1000.

B. Dryer

1. The maximum allowable VOC emissions shall not exceed the following:

o Perchloroethylene	1.7 lb/hr	1.2 TPY
o n-Butyl Alcohol	0.3 lb/hr	0.2 TPY

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82738
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

2. The permitted annual hours of operation are 1500.

C. Tank-Washout

1. The maximum allowable VOC emissions shall not exceed the following:

o Perchloroethylene	3.3 lb/hr	3.7 TPY
o n-Butyl Alcohol	0.6 lb/hr	0.6 TPY

2. The permitted annual hours of operation are 2250.

D. Solvent Recovery Still

1. The maximum allowable VOC emissions shall not exceed 7.1 lb/hr and 21.2 TPY (75% Perchloroethylene and 25% n-Butyl Alcohol)

2. The permitted annual hours of operation are 6000.

E. Cyrel Plate Room Operations

1. Objectionable odors shall not be allowed off plant property.

2. All air pollution sources are subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.

3. According to FAC Rule 17-2.620(1)(a), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the department. Currently, there are no control strategies associated with this operation other than crew efficiency to minimize pollutant emissions. The following procedures shall be utilized to minimize pollutant emissions, but shall not be limited to:

- o maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.,;
- o where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use;

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82738
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

- o all fittings, valves, lines, etc., shall be properly maintained;
- o prevent excessive turbulence across exposed VOC;
- o all VOC spills shall be attended to immediately and the discardings properly disposed of, recycled, etc.; and,
- o maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

4. A material balance scheme will be used to account for the VOC emissions, which involves the following:

Beginning Inventory	+	Inventory Received	-	Recycled Material	-	Final Inventory	=	Pollutant Emissions Released Into The Atmosphere
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The annual VOC emissions per source shall be accounted for monthly, verifiable on a 24-hour basis, and shall be submitted in an AOR (annual operating report) within 60 days after the anniversary date of the operating permit(s) once acquired and shall be submitted to the DER's St. Johns River District office. All clean-up solvents shall be accounted for also.

5. 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 St. Johns River 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 Rule 17-4.22 and 17-4.23)

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)

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82738
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

Issued this 19 day of March, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 1

AC 48-82738

List of Attachments

2. Applications to Construct Air Pollution Sources, DER Form 17-1.202 (1), and Frank L. Cross' cover letter dated February 16, 1984.
3. C. H. Fancy's letter dated March 19, 1984.
4. Robert E. Kindorf's letter with attachments dated April 19, 1984, (confidential).
5. C. H. Fancy's letter dated May 23, 1984.
6. Applications to Construct Air Pollution Sources, DER Form 17-1.202(1), and Frank L. Cross' cover letter dated May 23, 1984.
7. C. H. Fancy's letter dated October 4, 1984.
8. Carol A. Forthman's letter dated April 8, 1985.
9. Robert E. Kindorf's letter dated April 12, 1985.
10. Winston A. Smith's letter with attachment dated June 14, 1985.
11. Robert L. Rhodes' letter dated June 21, 1985.
12. Carol A. Forthman's letter dated June 27, 1985.
13. Attendee list of a meeting held at Region IV EPA in Atlanta, Georgia, on July 3, 1985.
14. Robert E. Kindorf's letter dated August 9, 1985.
15. Robert E. Kindorf's letter with attachments dated July 17, 1985, (confidential).
16. Robert E. Kindorf's letter dated August 9, 1985.
17. Robert L. Rhodes' letter with attachment dated October 2, 1985.
18. Carol A. Forthman's letter with attachment dated October 11, 1985.
19. Robert E. Kindorf's letter dated October 17, 1985.
20. Applications to Construct Air Pollution Sources, DER Form 17-1.202(1), and Jerome J. Guidry's cover letter dated November 13, 1985.
21. Consent Order, OGC Case No. 84-0641, filed by Carol A. Forthman, Assistant General Counsel-DER, and signed December 2, 1985.

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 48-82733
Expiration Date: August 31, 1986
County: Orange
Latitude/Longitude: 28° 33' 08"N
81° 21' 05"W/
Project: Kidder CI and Catalytic
Incinerator System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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:

The Oylmpia Model 726 Kidder CI (Central Impressions) is a flexographic printing and coating unit with three associated natural gas dryers: a 1.4×10^6 Btu/hr - overhead dryer, a 1.2×10^6 Btu/hr flexographic dryer, and a 0.8×10^6 Btu/hr coating dryer. A catalytic incinerator will be retrofitted and required to meet LAER (lowest achievable emission rate: minimum 70% capture efficiency and 95% destruction efficiency). The incinerator will be custom designed by Etter Engineering Company, Inc., and is a 2500 CFM natural gas fired (0.8×10^6 Btu/hr) unit utilizing an Eclipse model 80-AHO burner. The duct work and collection system will be designed by Dec-E-Tech Industrial Design Engineering. The source emits volatile organic compounds. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group No. 275 - commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The source shall be as reflected in the permit application, plans documents, drawings and amendments, except as otherwise noted on pages 5-7 of the "Specific Conditions."

Attachments:

1. List of Attachments.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82733
Expiration Date: August 31, 1986

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 48-82733
Expiration Date: August 31, 1986

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 48-82733
Expiration Date: August 31, 1986

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.
- (x) 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 48-82733
Expiration Date: August 31, 1986

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. The annual hours of operation shall not exceed 4000.
- 2. The maximum allowable VOC (volatile organic compounds-organic solvents) emission limit shall not exceed 8.1 pounds per hour and 16.1 tons per year (based on LAER-minimum 70% capture efficiency and 95% destruction efficiency). The maximum rated production capacity is 12.83 reams per hour (based on 3000 square feet per ream).

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82733
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

3. A compliance test shall be conducted to determine the control system's capture efficiency and the incinerator's destruction efficiency. The compliance test shall be conducted while operating at 100% of the rated production capacity. All subsequent compliance test(s) can be conducted while the unit is operating at 90-100% of the rated production capacity.

- o Destruction efficiency determination

The test method shall be EPA Method 25, Appendix A, 40 CFR 60, or other test method(s) approved by the department.

- o Capture efficiency determination

The procedure proposed by the permittee involves the determination and comparison of the amount of VOC used during the test and the VOC concentration measured at the inlet of the incinerator over the same period of time.

4. All compliance tests shall require written notification to the DER's St. Johns River District office fifteen (15) days prior to the day of a test. All test(s) results shall be submitted to the DER's St. Johns River District office forty-five (45) days after completion of the last test run.

5. Objectionable odors shall not be allowed off plant property.

6. The units are subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.

7. According to 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.

8. All VOC emissions shall be accounted for monthly and verifiable on a 24-hour basis, and should include clean-up solvents. The annual amount of VOC emissions shall be submitted in an AOR (annual operating report) to the DER's St. Johns River District office within sixty (60) days after the anniversary date of the operating permit once acquired.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82733
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

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 St. Johns River 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 Rule 17-4.22 and 17-4.23)

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 19 day of March, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

ATTACHMENT 1

AC 48-82733

AC 48-82735

AC 48-82736

List of Attachments

2. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and Frank L. Cross's cover letter dated February 16, 1984.
3. C. H. Fancy's letter dated March 19, 1984.
4. Robert E. Kindorf's letter with attachments dated April 19, 1984, (confidential).
5. C. H. Fancy's letter dated June 8, 1984.
6. Robert E. Kindorf's letter with attachments dated June 28, 1984.
7. Frank L. Cross's document entitled "Air Emission Compliance Plan for VOC's" received August 21, 1984 by DER OGC.
8. Frank L. Cross's letter with attachments dated August 30, 1984.
9. Frank L. Cross's letter dated September 10, 1984.
10. C. H. Fancy's letter dated October 4, 1984.
11. Robert E. Kindorf's letter with attachments dated October 23, 1984.
12. Robert E. Kindorf's letter dated October 31, 1984, (confidential).
13. Robert L. Rhodes' letter dated November 1, 1984, (confidential).
14. Robert E. Kindorf's letter dated November 29, 1984.
15. Carol A. Forthman's letter dated April 8, 1985.
16. Robert E. Kindorf's letter dated April 12, 1985.
17. Robert E. Kindorf's letter with attachments dated May 8, 1985, (confidential).
18. Winston A. Smith's letter with attachment dated June 14, 1985.
19. Robert L. Rhodes' letter dated June 21, 1985.
20. Carol A. Forthman's letter dated June 27, 1985.
21. Spiralkote document submitted to Region IV EPA on July 3, 1985, (confidential).
22. Attendee list of a meeting held at Region IV EPA in Atlanta, Georgia, on July 3, 1985.
23. Robert E. Kindorf's letter with attachments dated July 17, 1985, (confidential).
24. Robert E. Kindorf's letter dated August 9, 1985.
25. Robert L. Rhodes' letter with attachment dated October 2, 1985.
26. Carol A. Forthman's letter with attachment dated October 11, 1985.
27. Robert E. Kindorf's letter dated October 17, 1985.
28. Applications to Construct Air Pollution Sources, DER Form 17-1.202(1), and Jerome J. Guidry's cover letter dated November 13, 1985.
29. Consent Order, OGC Case No. 84-0641, filed by Carol A. Forthman, Assistant General Counsel-DER, and signed December 2, 1985.
30. Proposed LAER determination, which was noticed in the FAW on January 17, 1986 issue.
31. Robert E. Kindorf's letter dated January 17, 1986.

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 48-82735
Expiration Date: August 31, 1986
County: Orange
Latitude/Longitude: 28° 33' 08"N/
81° 21' 05"W
Project: Kidder I

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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:

The Kidder I is an existing flexographic printing and coating unit with one associated 1×10^6 Btu per hour natural gas burner. The source emits volatile organic compounds. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group Number 275 - Commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The source shall be as reflected in the permit application, plans documents, drawings and amendments, except as otherwise noted on pages 5-7 of the "Specific Conditions."

Attachments:

1. List of Attachments.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82735
Expiration Date: August 31, 1986

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 48-82735
Expiration Date: August 31, 1986

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 48-82735
Expiration Date: August 31, 1986

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.

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 48-82735
Expiration Date: August 31, 1986

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. The annual hours of operation shall not exceed 4250.
2. The maximum allowable VOC emissions shall not exceed 22.4 lbs/hr and 47.7 tons/yr. The maximum rated production capacity is 9.17 reams per hour (based on 3000 square feet per ream).

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82735
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

3. A compliance test(s) shall be conducted to determine the VOC emissions. The method to be used is EPA Method 25, Appendix A, 40 CFR 60, or other tests method(s) approved by the department. The compliance test(s) shall be conducted while the unit is operating at 100% of the rated capacity. All subsequent compliance test(s) can be conducted while the unit is operating at 90-100% of the rated production capacity.
4. All compliance tests shall require written notification to the DER's St. Johns River District office fifteen (15) days prior to the day of a test. All test(s) results shall be submitted to the DER's St. Johns River District office forty-five (45) days after completion of the last test run.
5. Objectionable odors shall not be allowed off plant property.
6. The unit is subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.
7. According to 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.
8. All VOC emissions shall be accounted for monthly and verifiable on a 24-hour basis, and should include clean-up solvents. The annual amount of VOC emissions shall be submitted in an AOR (annual operating report) to the DER's St. Johns River District office within sixty (60) days after the anniversary date of the operating permit once acquired.
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)

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82735
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

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 St. Johns River 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 Rule 17-4.22 and 17-4.23)

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 19 day of March 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

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 48-82736
Expiration Date: August 31, 1986
County: Orange
Latitude/Longitude: 28° 33' 08"N/
81° 21' 05"W
Project: Kidders II & III and
Catalytic Incinerator
System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 permitting of Kidder II with an associated natural gas (NG) heater (0.8×10^6) Btu/hr) and Kidder III with an associated NG heater (1.2×10^6 Btu/hr). A catalytic incinerator will be retrofitted and required to meet LAER (lowest achievable emission rate: minimum 70% capture efficiency and 95% destruction efficiency). The incinerator will be custom designed by Etter Engineering Company, Inc., and is a 2500 CFM NG fired (0.8×10^6 Btu/hr) unit utilizing an Eclipse model 80-AHO burner. The duct work and collection system will be designed by Dec-E-Tech Industrial Design Engineering. The sources emit volatile organic compounds. The UTM coordinates are Zone 17, 461.37 km East and 3142.05 km North.

The Standard Industrial Codes are: Major Group 27 - Printing/Publishing; Group Number 275 - Commercial Printing; Industrial Number 2751 - Commercial Printing, Letterpress and Screen.

The source shall be as reflected in the permit application, plans documents, drawings and amendments, except as otherwise noted on pages 5-7 of the "Specific Conditions."

Attachments:

1. List of Attachments.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82736
Expiration Date: August 31, 1986

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 48-82736
Expiration Date: August 31, 1986

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 48-82736
Expiration Date: August 31, 1986

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.
- (x) 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 48-82736
Expiration Date: August 31, 1986

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. The annual hours of operation per unit, Kidder II or III, shall not exceed 4250.

2. The maximum allowable VOC (volatile organic compounds-organic solvents) emission limit, total from both units, shall not exceed 15.0 pounds per hour and 31.9 tons per year (based on LAER-minimum 70% capture efficiency and 95% destruction efficiency). The maximum rated production capacity per unit is 9.17 reams per hour (based on 3000 square feet per ream).

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82736
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

3. Compliance test(s) shall be conducted to determine the control system's capture efficiency and the incinerators destruction efficiency. A compliance test shall be conducted with only one unit in operation and a compliance test shall be conducted with both units in operation. Compliance test(s) shall be conducted while operating at 100% of the rated production capacity. All subsequent compliance test(s) can be conducted while the unit(s) is/are operating at 90-100% of the rated capacity.

- o Destruction efficiency determination

The test method shall be EPA Method 25, Appendix A, 40 CFR 60, or other test method(s) approved by the department.

- o Capture efficiency determination

The procedure proposed by the permittee involves the determination and comparison of the amount of VOC used during a test run and VOC concentration measured at the inlet of the incinerator over the same period of time.

4. All compliance test(s) shall require written notification to the DER's St. Johns River District office fifteen (15) days prior to the day of a test(s). All test(s) results shall be submitted to the DER's St. Johns River District office forty-five (45) days after completion of the last test run.

5. Objectionable odors shall not be allowed off plant property.

6. The units are subject to the provisions of FAC Rule 17-2.250, Excess Emissions. When a report of excess emissions is required, notify the DER's St. Johns River District office.

7. According to 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.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-82736
Expiration Date: August 31, 1986

SPECIFIC CONDITIONS:

8. All VOC emissions per source shall be accounted for monthly and verifiable on a 24-hour basis, and should include clean-up solvents. The annual amount of VOC emissions shall be submitted in an AOR (annual operating report) to the DER's St. Johns River District office within sixty (60) days after the anniversary date of the operating permit once acquired.

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 St. Johns River 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 Rule 17-4.22 and 17-4.23)

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 19 day of March, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

Lowest Achievable Emission Rate (LAER) Determination
Spiralkote, Inc.
Orange County

The applicant has installed three (3) flexographic printing presses at their facility in Orlando, Florida. The units will consist of a Kidder Central Impression (CI) Printing Press and two Kidder Presses (II and III). The units are used for printing labels on composite cans. The Kidder CI and Kidder units II and III will operate 4000 and 4250 hours per year respectively.

The flexographic printing process uses a rubber image carrier located above the surface of the plate, is usually web fed, and runs on a variety of substrates. Basically, the process is the application of an alcohol based ink to the surface of a moving web or film, then rapid solvent evaporation using heated air. The solvent laden air is currently exhausted from the system directly into the atmosphere.

The solvent vapors are defined as volatile organic compounds (VOC's) and when discharged to the atmosphere contribute significantly to air pollution. VOC emissions are most significant as air pollutants in their role of photochemical oxidant precursors.

The dryer is the major source of VOC emissions with a lesser amount emitted at the ink fountain, the press, and the chill rolls. Vapor capture systems are necessary to minimize VOC vapor loss around the ink fountain and at the chill rolls. VOC emissions can also be reduced by using low solvent technology inks, if compatible with the planned line substrate.

The Spiralkote printing facility is located in Orange County, which is classified nonattainment for the pollutant ozone, Rule 17-2.410. The installation of the Kidder II unit caused the facility ozone (VOC) emissions to exceed 100 tons per year thus becoming major and requiring employment of Lowest Achievable Emission Rate (LAER) as a review requirement. The installation of the Central Impression and the Kidder III unit each resulted in VOC emissions that exceeded the 40 ton per year significant emission rate; Table 500-2 Regulated Air Pollutants - Significant Emission Rates.

The printing press installations have resulted in Spiralkote, Inc. becoming a major facility for ozone (VOC) in a nonattainment area for ozone (VOC) and for modifications to a major facility to occur, thus becoming subject to the provisions of Rule 17-2.510 (2)(d) 4.a. LAER has been applied for each aforementioned printing press in accordance with the regulations (Rule 17-2.510 (4)(a)). The procedure for determining LAER is set forth in Rule 17-2.640.

Date of Receipt of LAER application:

November 19, 1985

Date of Publication in the Florida Administrative Weekly:

January 17, 1986

Review Group Members:

This determination was based upon comments received from the Stationary Source Control Section and the St. Johns River District.

LAER Determined by DER:

Pollutant	Emission Limit
Ozone (VOC)	70 percent capture efficiency of the VOC vapors emitted at the press and 95 percent destruction of the collected vapors by the catalytic incinerator.

LAER Determination Rationale:

In flexographic printing from stationary sources, volatile organic compounds (VOC's) can be released to the atmosphere by evaporation from the inking, cleaning, and curing operations. Hydrocarbons comprise a class of VOC's containing only carbon and their by-products are considered poisonous, but most are harmful only in very high concentrations. Hydrocarbons can react with other chemicals, notably in the photochemical reaction, which results in the oxidants commonly called smog.

To control VOC emissions the applicant first considered using waterborne inks instead of organic solvent inks. They experimented with waterborne inks but concluded that, even though promising, water borne inks are not yet well enough developed for their printing requirements. Only add-on control devices remain for consideration.

The three most popular types of add-on devicies are those for thermal and catalytic incineration and carbon adsorption. The applicant will use a catalytic incinerator to reduce by 95% the amount of VOC's delivered to the inlet of the incinerator when the printing presses described in this determination are operating. The incineration system is to be custom built by the Etter Engineering Company, Inc. The applicant will install the necessary enclosures and ducting for the printing presses to capture 70 percent of the vapors generated. The planned incinerator and press ducting modifications will result in 95 less tons of VOC's discharged into the atmosphere per year.

The Department, when preparing a Lowest Achievable Emission Rate (LAER) determination, shall give consideration to and make a determination that reflects: 1) information published by the USEPA including the BACT/LAER Clearinghouse, 2) the most stringent emission limitation which is contained in the implementation plan of any state, 3) the most stringent emission limitation which is achieved in practice, and 4) all scientific, engineering, technical material, or other relevant information available to the department.

The latest (June 1985) BACT/LAER Clearinghouse summary lists data for sixteen facilities which use printing presses, half of which are rotogravure systems. Most of the efficiencies reported were based on stack tests for the control device and did not include the capture efficiency of the vapors generated at the emission point. At one of the listed facilities a material balance around the control device and vapor collection system was done. The control device destruction efficiency was 95% and the capture efficiency was 73%. This facility did not have to meet LAER.

The literature research indicates that a 95% destruction efficiency of a catalytic incinerator and vapor system capture efficiency between 70-73 percent are the most stringent limits that meet the LAER requirements as set for the in Rule 17-2.510(4)(b). The department agrees that the VOC emission limit for the printing presses, as proposed by the applicant, is LAER.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended by:



C. H. Fancy, P.E., Deputy Chief, BAQM

3/19/86

Date

Approved by:



Victoria J. Tschinkel, Secretary

3/19/86

Date

Technical Evaluation
and
Preliminary Determination

Spiralkote Inc.
Orange County
Orlando, Florida

Permit Numbers:
AC 48-82733
82735
82736
82738

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

January 20, 1986

I. PROJECT DESCRIPTION

A. Applicant

Spiralkote Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

B. Project Description

The applicant has made application to obtain permits for four (4) operating flexographic printing and coating units with associated natural gas heaters. Three of the units will be retrofitted with catalytic incinerators to control pollutant emissions. One catalytic incinerator will be controlling the pollutant emissions from two of the units through a common header. Also, the applicant has submitted applications to obtain permits for the pollutant emitting sources that make up the Cyrel Plate Room (CPR) operations.

The SIC (standard industrial codes) for the facility 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

The flexographic printing and coating units are used to produce composite can labels. The maximum rated production capacities are 9.17 reams per hour for Kidders I, II, and III, and 12.83 reams per hour for the Kidder CI (based on 3000 square feet per ream). The following control strategies will be instituted at the facility to minimize pollutant emissions and to comply with Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4:

- o Kidder I - dedicate as much RACT compliance jobs that attain the desired quality product
- o Kidder II & III - will be retrofitted with a catalytic incinerator, connected through a common header, and shall meet LAER (lowest achievable emission rate)
- o Kidder CI - will be retrofitted with a catalytic incinerator and shall meet LAER

The CPR operation is an integral part of the flexographic printing and coating operations. The pollutant emissions are exhausted through vent stacks in the roof. The only control measure employed is crew efficiency to prevent excessive pollutant emissions.

II. RULE APPLICABILITY

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

The application packages were deemed complete November 14, 1985.

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's operation emits as its major pollutant VOC (volatile organic compounds), which are defined pursuant to FAC Rule 17-2.100(209) and are considered to be precursors to ozone. The following table will reflect the projected current annual potential VOC emissions from the facility and each source's installation date:

Table 1

Source	Projected Current Annual Potential VOC Emissions (TPY)	Installation Date
Kidder I	47.6	October '77
Kidder II	47.6	April '80
Kidder CI	44.8	February '82
Kidder III	47.6	February '83
Cyrel Plate Room		February '81
o Tank-Washout	4.3	
o Solvent Recovery Still	21.2	
o Dryer	1.4	
Total:	<u>214.5</u>	

Note: o Kidders I, II & III emissions are based on 4250 hr/yr operation; Kidder CI emissions are based on 4000 hr/yr operation; Cyrel Plate Room hours of operation are variable per source.

o There are currently no pollutant emission control systems associated with the printing and coating units.

Since the applicant cannot adequately quantify and qualify each source's actual historical hours of operation, the federal policy to establish annual potential pollutant emissions is to assume that the facility (State's source) could have operated 8760 hours. Therefore, each printing and coating unit would potentially emit approximately 98 TPY of VOC. Consequently, this value is to be used to assess rule applicability.

There will be small amounts of pollutants emitted from the combustion of natural gas (NG) in the dryers associated with the printing and coating units. The projected annual potential pollutant emissions expected from these sources in pounds per year (lb/yr) are:

Table 2

	Projected Annual Potential Pollutant Emissions (lb/yr)				
	PM	SO ₂	NO _x	CO	NMHC
4 Printing & Coating Units (32.95 x 10 ⁶ cf/yr - total NG usage)	165	20	3295	659	175

Note: Emissions based on Table 1.4-1, Uncontrolled Emission Factors For Natural Gas Combustion, AP-42 Emission Factors:

- o PM - particulate matter: 5 lb/10⁶ cf NG
- o SO₂ - sulfur dioxide: 0.6 lb/10⁶ cf NG
- o NO_x - nitrogen oxides: 100 lb/10⁶ cf NG
- o CO - carbon monoxide: 20 lb/10⁶ cf NG
- o NMHC - nonmethane hydrocarbon: 5.3 lb/10⁶ cf NG

All of the sources' VOC emissions are initially subject to review under FAC Rule 17-2.510, New Source Review for Nonattainment Areas. All of the other pollutant emissions are initially subject to review under FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD). If any source's pollutant emissions are exempt from review under either of these two rules, then the emissions are subject to review under FAC Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The rules for existing and certain new and modified flexographic printing presses in ozone nonattainment areas are contained in FAC Rule 17-2.650(1)(f)16, Graphic Arts Systems. The effective date of this rule was March 14, 1979. For the purpose of FAC Rule 17-2.650(1), existing sources are those which were constructed or for which a construction permit was issued prior to July 1, 1979, in accordance with FAC Rule 17-2.100(67).

Kidder I is an existing minor emitting source and facility in accordance with FAC Rules 17-2.100(116) and (115), respectively, because the potential emissions are less than 100 TPY of any pollutant. The source's VOC emissions are not subject to the provisions of FAC Rule 17-2.510(4), Preconstruction Review Requirements, in accordance with FAC Rule 17-2.510(2)(d)1. Therefore, its emissions shall be subject to the provisions of FAC Rule 17-2.520. Because the potential VOC emissions are less than 100 TPY, the source is not subject to the provisions of FAC Rule 17-2.650(1)(f)(16). Therefore, Kidder I shall be permitted

in accordance with FAC Rule 17-2.620, General Pollutant Emission Limiting Standards.

Kidder II is considered a new minor source and would constitute a modification to a minor facility. Therefore, the emissions are not subject to FAC Rule 17-2.510(4) in accordance with FAC Rule 17-2.510(2)(d)3. Consequently, the emissions are subject to review in accordance with FAC Rule 17-2.520. Because the combined potential VOC emissions of Kidder I and II exceeds 100 TPY, Kidder II is subject to the provisions of FAC Rule 17-2.650(1)(f).^{b.}

¹⁶
The Cyrel Plate Room (CPR) operations were installed in February, 1981. The following table will reflect the projected annual potential pollutant emissions from the CPR operations, but will not reflect the pollutant emissions already contained in Table 1:

Table 3

	Pollutant	Projected Annual Potential Emissions (lb)
Cyrel Plate Room		
o Finishing Tank	HCl	248.0 lb/yr
	Bleach	32.3 lb/yr

Note: Emissions were estimated to be 2% of the total usage.

The installation of the CPR operations would constitute a minor modification to a major facility. Based on the total projected VOC emissions from the CPR operations of 27.0 TPY, the emissions are less than the VOC significant emission rate of 40 TPY contained in Table 500-2 pursuant to FAC Rule 17-2.510(2)(e)2. The CPR sources' emissions are not subject to FAC Rule 17-2.510(4) in accordance with FAC Rule 17-2.510(2)(d)4.a. Therefore, the emissions are subject to the provisions of FAC Rule 17-2.520. Since there is not a specific source emission limiting standard contained in FAC Rule 17-2.650, the CPR sources shall be permitted in accordance with FAC Rule 17-2.620.

Kidder Central Impression (CI) is a new minor source and would constitute a modification to a major facility. Since the installation of the CPR operations, the facility only needed to increase its VOC emissions by approximately 13.0 TPY to exceed the significant emission rate contained in Table 500-2, thus requiring review of the affected source's emissions under FAC Rule 17-2.510(4) pursuant to FAC Rule 17-2.510(2)(d)4.a. Therefore, the VOC emissions of Kidder CI are subject to the provisions of FAC Rule 17-2.510(4), which includes the

requirement to meet the Lowest Achievable Emission Rate (LAER) as set forth in FAC Rule 17-2.640.

Kidder III is a new minor source and would constitute a modification to a major facility. Because the VOC emissions are greater than the significant emission rate contained in Table 500-2, the emissions are subject to the provisions of FAC Rule 17-2.510(4) in accordance with FAC Rule 17-2.510(2)(d)4.a., which includes the requirement to meet the LAER as set forth in FAC Rule 17-2.640.

As required by FAC Rule 17-2.510(4)(a), the applicant proposed LAER for the Kidder III and Kidder CI units in accordance with FAC Rule 17-2.640. Since the VOC emissions from the Kidder II unit will be controlled with the same catalytic incinerator controlling the VOC emissions from the Kidder III unit, Kidder II will be required to meet the same VOC emission rate imposed on Kidder III through the determination of LAER. The applicant proposed a VOC capture efficiency of 70% and a destruction efficiency of 95% of the VOC captured/delivered to the inlet of the incinerator for each of the proposed catalytic incinerator systems.

Upon issuance of construction permits for all of the air pollution sources located at the existing facility, the applicant will be in statewide compliance with all applicable rules and regulations pursuant to FAC Rule 17-2.510(4)(b).

In accordance with Table 510-1, pursuant to FAC Rule 17-2.510(5), there is adequate new source allowance in Orange County to allow the permitting of the air pollution sources at the existing facility and satisfies the requirements of FAC Rules 17-2.510(4)(c) and (d).

According to 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.

All air pollution sources are subject to the provisions of FAC Rule 17-2.250, Excess Emissions.

According to FAC Rule 17-2.620(1)(a), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

According to 17-2.620(2), no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is

defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance according to 17-2.100(130). Therefore, objectionable odors shall not be allowed off plant property.

For Kidder CI, compliance testing shall be conducted on the new catalytic incinerator system to establish the VOC capture and destruction efficiencies. The compliance test method to demonstrate the destruction efficiency shall be EPA Method 25 in accordance with Appendix A, 40 CFR 60. The applicant proposes to demonstrate the capture efficiency by comparing the amount of VOC used during a test and the VOC concentration measured at the inlet of the incinerator over the same period of time. The compliance tests shall be conducted while the unit is operating at 100% of its rated production capacity. Future compliance testing shall be conducted while the unit is operating at 90-100% of the rated production capacity.

For Kidder II and III, compliance testing shall be conducted on the new catalytic incinerator system to establish the VOC capture and destruction efficiencies. A compliance test shall be conducted while only one of the units is operating. Then, a compliance test shall be conducted while both units are operating. The compliance test method to demonstrate the destruction efficiency shall be EPA Method 25 in accordance with Appendix A, 40 CFR 60. The compliance tests shall be conducted while the unit(s) are operating at 100% of their rated production capacity. Future compliance testing shall be conducted while the unit(s) are operating at 90-100% of their rated production capacity.

For Kidder I, the applicant shall account for the VOC emissions from this unit. Accounting of the VOC emissions shall be maintained on a monthly basis and, due to EPA policy for ozone nonattainment areas, shall be verifiable on a 24-hour basis. VOC emissions from Kidder II, CI, and III shall be maintained on a monthly basis and verifiable on a 24-hour basis. The annual VOC emissions per unit from the facility shall be submitted in an AOR (annual operating report) within sixty (60) days after the anniversary date of the operating permits once they are acquired and shall be submitted to the DER's St. Johns River District office. Cleaning solvents shall be accounted for and included in the AOR.

A material balance scheme is an acceptable methodology for accounting for VOC emissions from the Cyrel Plate Room operations. Accounting shall be maintained monthly, verifiable on a 24-hour basis, and shall be included in the AOR.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

A. Emission Limitations

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

Table 4

Source	Maximum Allowable lb/hr	VOC Emissions TPY	
Kidder I	22.4	47.7	<i>~ does not count against the NS Allowance</i>
Kidder II and III	15.0	31.9	
Kidder CI	8.1	16.1	
Cyrel Plate Room			
o Tank-Washout	3.9	4.3	<i>(3 x 1.9) sec 4/24/86 letter + 5.7 Solvent Clean-up</i>
o Solvent Recovery Still	7.1	21.2	
o Dryer	1.9	1.4	

Note: Kidder I, II, and III emissions based on 4250 hr/yr operation; Kidder CI emissions based on 4000 hr/yr operation; Tank-Washout emissions based on 2250 hr/yr operation and 4% loss of the total usage; Solvent Recovery Still emissions based on 6000 hr/yr operation, 75% Perchloroethylene and 25% n-Butyl Alcohol, and 65% projected recovery efficiency; Dryer emissions based on 1500 hr/yr operation and the emissions are estimated to be 2% of the total tank-washout usage.

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, an air quality analysis was not required for the proposed construction and the proposed changes will not interfere with reasonable further progress toward attaining the ambient air quality standards.

IV. CONCLUSION

Through the imposition of LAER, a significant reduction of VOC emissions will occur once the catalytic incinerators have been installed and operating properly. There will be 122.6 tons (approximately 14%) of the Orange County's allotted new source allowance assigned to this facility. *change 80.6 5-29-86 ppm*
which includes 5.7 tons clean-up solvent

The permitted emissions from the proposed changes should not cause any violation of Florida's ambient air quality standards.

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