

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 48-192219
Orange County

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

Enclosed is Permit Number AC 48-192219 to allow an increase in the permitted hours of operation and pollutant emissions for the facility's Olympia Model 946CI, which is a flexographic printing and coating unit, located in Orlando, Orange County, Florida, issued pursuant to Section 403, Florida Statutes.

Any party to this Order (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 Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for James K. Pennington
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 7-5-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Judy Rogers
Clerk

7-5-91
(Date)

Copies furnished to:
C. Collins, C District
D. Nester, OCEPD
J. Guidry, P.E., PBS&I, Inc.

Final Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Construction Permit No.
AC 48-192219

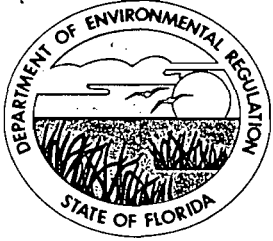
Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

June 25, 1991

Final Determination

The construction permit application package and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Orlando Sentinel on June 6, 1991. The Revised Technical Evaluation and Preliminary Determination was distributed on May 22, 1991, and available for public inspection at the Department's Central District office and the Department's Bureau of Air Regulation office.

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



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

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

Permit Number: AC 48-192219
Expiration Date: March 31, 1992
County: Orange
Latitude/Longitude: 28°24'21"N
81°23'40"W
Project: Olympia 746 Flexographic
Printing & Coating Unit &
Associated Catalytic Incinerator
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1990 version). 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 modification of the Olympia Model 746 Central Impressions, which is a flexographic printing and coating unit with associated natural gas dryers: a pair of 0.8×10^6 Btu/hr overhead dryer, a pair of 0.8×10^6 Btu/hr overhead dryer, and a pair of 0.4×10^6 Btu/hr tunnel dryers. 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 was custom designed by Etter Engineering Company, Inc., and consists of three incinerators (No. 1: 2252 dscfm; No. 2: 3065 dscfm; and, No. 3: 2658 dscfm) and are natural gas fired (0.8×10^6 Btu/hr, maximum; 0.1×10^6 Btu/hr, normal) using Eclipse Model 80-AHO burners. The duct work and collection system was designed and installed by Dec-E-Tech Industrial Design Engineering. The source emits volatile organic compounds and organic solvents (used for clean-up). The UTM coordinates are Zone 17, 461.37 km East and 3142.02 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 sources shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received January 29, 1991.

PERMITTEE:
Spiralkote, Inc.

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Attachments cont.:

2. Mr. Bruce P. Miller's letter with enclosure ("Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency") dated May 15, 1990.
3. Technical Evaluation and Preliminary Determination dated April 4, 1991.
4. Mr. E. J. Ward Jr.'s letter received April 26, 1991.
5. Revised Technical Evaluation and Preliminary Determination dated May 21, 1991.

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee

PERMITTEE:
Spiralkote, Inc.

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Expiration Date: March 31, 1992

GENERAL CONDITIONS:

to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-192219
Expiration Date: March 31, 1992

GENERAL CONDITIONS:

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-192219
Expiration Date: March 31, 1992

GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The source may operate continuously (i.e., 8760 hrs/yr).

2. Total maximum allowable VOC (volatile organic compounds-organic solvents) emission limit shall not exceed 60.0 pounds per "run hour" and 71.3 tons per year, including clean-up solvent less any solvent waste shipped from the source [based on a minimum 70% capture and transport efficiency and a minimum 95% destruction efficiency (oxidizes at least 95% of the VOC measured as total combustible carbon to carbon dioxide and water)]. The 12 month rolling cumulative total VOC emissions from the press shall not exceed 71.3 TPY calculated on a monthly basis. The VOC emissions will be calculated based on actual daily input and annual test results for capture and destruction. EPA Method 24A shall be utilized to determine the VOC content of the ink pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version).

3. The maximum input to the press is 180 pounds of VOC per "run hour" calculated on a daily basis. The permitted materials are all inks, solvents and coatings similar to those stated in the application.

4. The initial and annual demonstration of the capture efficiency shall be conducted using the U.S. EPA's "Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency" (attached). The permittee shall notify the Department's Central District in writing of the protocol that will be used for the capture efficiency demonstration purpose at least 60 days prior to compliance testing.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-192219
Expiration Date: March 31, 1992

SPECIFIC CONDITIONS:

5. Initial and annual compliance tests for the actual destruction efficiency (comparison of the inlet and outlet concentrations) of the catalytic incinerator shall be conducted using EPA Method 25, pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version). Other test methods may be used as long as prior Department approval has been granted in writing in accordance with F.A.C. Rule 17-2.700(3).

6. A material balance scheme shall be used to assess and report the annual (verifiable monthly) VOC/solvent emissions associated with clean-up. The material balance scheme will account for the VOC/solvents received; any control measures used (must be quantifiable), and any VOC/solvents shipped off the facility by a properly licensed hauler.

7. The Department's Central District office shall be notified in writing at least 15 days prior to conducting compliance tests pursuant to F.A.C. Rule 17-2.700(2).

8. Test reports shall be submitted to the Department's Central District office no later than 45 days after the last sampling run of each test is completed pursuant to F.A.C. Rule 17-2.700(7).

9. This project is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

10. The sources are subject to the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

11. Objectionable odors shall not be allowed off plant property pursuant to F.A.C. Rules 17-2.620(2) and 17-2.600(1)(a)2.

12. Pursuant to F.A.C. Rule 17-2.600(1)(a)1., the catalytic incinerator is subject to the visible emissions standard of "no visible emissions" (5% opacity) except that visible emissions not exceeding 20% opacity are allowed for up to three minutes in any one hour period. Initial and annual compliance tests shall be conducted using DER Method 9 pursuant to Table 700-1, F.A.C. Rule 17-2.700.

13. An annual operating report shall be submitted to the Department's Central District office by March 1 of each calendar year accounting for the annual VOC/solvent emissions, which shall minimally include source test results, quantifiable fugitives and clean-up VOCs/solvents.

PERMITTEE:
Spiralkote, Inc.

Permit Number: AC 48-192219
Expiration Date: March 31, 1992

SPECIFIC CONDITIONS:

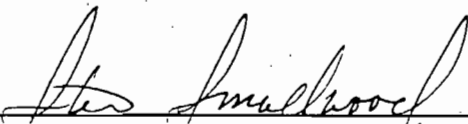
14. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Bureau of Air Regulation office.

15. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation office prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

16. An application for an operation permit must be submitted to the Department's Central District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 3rd day
of July, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 21, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Ed Ward, Jr., Executive V.P. - Production
Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32809

Dear Mr. Ward:

Attached is one copy of the Revised Technical Evaluation and Preliminary Determination (TE&PD) and proposed permit for Spiralkote, Inc. to modify the Olympia Model 746CI, which is a flexographic printing and coating unit, to allow an increase in the permitted hours of operation and the hourly VOC emissions limit. The unit has an associated collection and transport system and a catalytic incinerator system to treat emissions of volatile organic compounds and organic solvents. The revision is based on comments received from you on April 26, 1991, regarding the proposed TE&PD issued on April 4, 1991.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/plm

Attachments

c: C. Collins, Central District
J. Guidry, P.E., PBS&I, Inc.

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 48-192219

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction 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 Revised Technical Evaluation and Preliminary Determination.

The applicant, Spiralkote, Inc., applied on January 29, 1991, to the Department of Environmental Regulation for a permit to modify the Olympia Model 746CI, which is a flexographic printing and coating unit, to allow an increase in the permitted hours of operation and hourly emissions limit. The unit has an associated collection and transport system and a catalytic incinerator system to treat emissions of volatile organic compounds and organic solvents. The proposed project will occur at the applicant's facility located in Orlando, Orange County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an amendment to the air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. 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 a 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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in

the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for Barry D. Anteau
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

C. Collins, Central District
J. Guidry, P.E., PBS&I, Inc.

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 5-22-91.

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

Lyni Ober
Clerk

5-22-91
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Spiralkote, Inc., 1200 Central Florida Parkway, Orlando, Florida 32809, to modify the Olympia Model 746CI, which is a flexographic printing and coating unit, to allow an increase in the permitted hours of operation and hourly VOC emissions limit. The unit has an associated collection and transport system and a catalytic incinerator system to treat emissions of volatile organic compounds and organic solvents. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Revised Technical Evaluation and Preliminary Determination.

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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Barry Andrews 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.

Revised
Technical Evaluation
and
Preliminary Determination

Spiralkote, Inc.
Orange County
Orlando, Florida

Construction Permit No.
AC 48-192219

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

May 21, 1991

I. Application

A. Applicant

Spiralkote, Inc.
1200 Central Florida Parkway
Orlando, Florida 32821-9295

B. Project and Location

The applicant submitted a request for a modification to allow an increase in the permitted hours of operation and hourly VOC emissions limit and to redefine the raw material input rate. The source, an Olympia Model 746 Central Impressions printing and coating unit (OM746CI), emits volatile organic compounds (VOC). It has an associated dryer system, VOC emissions capture and transport system, and catalytic incinerator system.

The source is part of a facility located at the above address in Orange County. The UTM coordinates are Zone 17, 461.37 km East and 3,142.05 km North.

C. Process and Controls

The OM746CI is used to produce various printed materials. The maximum input rate to the press is 180 pounds of VOC per "run hour" calculated on a daily basis. The associated dryer system consists of three pairs of dryers and they utilize natural gas.

The VOC emissions capture and transport system is subject to a minimum capture efficiency of 70% and the catalytic incinerator system is subject to a minimum destruction efficiency of 95%. The catalytic incinerator system consists of three units and utilizes natural gas.

D. The Standard Industrial Codes are:

Major Group 27 - Printing/Publishing; Group No. 275 - Commercial Printing; Industrial No. 2751 - Commercial Printing, Letterpress and Screen.

II. Rule Applicability

The proposed project is subject to preconstruction review pursuant to Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1990 version).

The application package was deemed complete on January 29, 1991.

The facility is located in Orange County, which is designated as a maintenance area for the pollutant ozone pursuant to F.A.C. Rule 17-2.460(1)(b). The facility is a major facility for the pollutant VOC pursuant to F.A.C. Rule 17-2.100. VOCs 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 the exception of NOx, the total facility projected potential emission for each pollutant is less than 0.5 TPY and considered insignificant. The total facility NOx emissions are estimated to be 1.5 TPY and also considered insignificant.

The projected potential VOC emissions are 71.3 TPY, based on a monthly rolling cumulative total of VOC emissions including clean-up solvent less solvent waste shipped as hazardous waste. The maximum input rate of pounds of VOC to the press is 180 lbs/"run hour" and will be calculated on a daily basis. The projected potential hourly VOC emissions rate will increase from the permitted 22.8 lbs/hr to 60 lbs/"run hour."

An increase in the actual VOC emissions and the relaxation in the permitted hours of operation and hourly VOC emissions limit constitute a modification. Since the annual potential/allowable VOC emissions will not change, the request will be a minor modification and subject to review pursuant to F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The OM746CI printing and coating unit and associated control systems are subject to all applicable standards of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

The source is subject to the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.600(1)(a): Incinerators; 17-2.620: General Pollutant Emission Limiting Standards; 17-2.700: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operation-Problems. The minimum capture and transport efficiency was established pursuant to F.A.C. Rule 17-2.620(1)(a) and the applicant's request and the destruction efficiency was established pursuant to F.A.C. Rules 17-2.620(1)(a) and 17-2.650(1)(f)16.b.(i)(c) and the applicant's request.

A performance test shall be conducted on the capture and transport system to determine the capture efficiency and in accordance with the U.S. EPA's "Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency." The applicant will be required to select the protocol that will be used at least 60 days prior to compliance testing and the Department's Central District will be notified in writing.

EPA Method 25, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A, will be used to demonstrate the actual destruction efficiency (comparison of inlet and outlet concentrations). EPA Method 24A will be used to determine the VOC content of the ink in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Pursuant to F.A.C. Rule 17-2.600(1)(a)1., the visible emissions (VE) standards is "no visible emissions" (5% opacity), except that visible-emissions not exceeding 20% opacity are allowed for up to 3 minutes in any one hour. VE compliance testing shall be conducted using DER Method 9 in accordance with F.A.C. Rule 17-2.700 and Table 700-1.

Objectionable odors are not allowed off of the property in accordance with F.A.C. Rules 17-2.620(2) and 17-2.600(1)(a)2.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The regulated pollutant emissions from the source are VOCs. The source is also subject to a visible emissions (VE) standard. The following table will reflect the allowable emission standards and limitations:

Table

Source	Pollutant	Maximum Allowable Emissions
OM746CI	VOC	60 lbs/"run hour", including clean-up solvent less solvent shipped out as hazardous waste: 71.3 TPY
	VE	No VE (5% opacity), except that VE \leq 20% opacity are allowed for up to 3 minutes in any one hour

- Note:
- o Continuous operation is allowed (i.e., 8760 hrs/yr).
 - o The maximum input to the press is 180 lbs VOC/"run hour" calculated on a daily basis.
 - o Minimum capture and transport efficiency is 70%.
 - o Minimum destruction efficiency is 95%.
 - o The annual VOC emissions will be based on a monthly rolling cumulative total, including clean-up solvent less solvent waste shipped as hazardous waste.

B. Air Quality Analysis

Based on a technical review of the project, an air quality analysis was not required.

IV. Conclusion

Based on the information provided by Spiralkote, Inc., the Department has reasonable assurance that the proposed modification to allow an increase in the permitted hours of operation and hourly VOC emissions limit, as described in this revised evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

Barry D. Anders
36024
5-21-97



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

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

Permit Number: AC 48-192219
Expiration Date: March 31, 1992
County: Orange
Latitude/Longitude: 28°24'21"N
81°23'40"W
Project: Olympia 746 Flexographic
Printing & Coating Unit &
Associated Catalytic Incinerator
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1990 version). 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 modification of the Olympia Model 746 Central Impressions, which is a flexographic printing and coating unit with associated natural gas dryers: a pair of 0.8×10^6 Btu/hr overhead dryer, a pair of 0.8×10^6 Btu/hr overhead dryer, and a pair of 0.4×10^6 Btu/hr tunnel dryers. 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 was custom designed by Etter Engineering Company, Inc., and consists of three incinerators (No. 1: 2252 dscfm; No. 2: 3065 dscfm; and, No. 3: 2658 dscfm) and are natural gas fired (0.8×10^6 Btu/hr, maximum; 0.1×10^6 Btu/hr, normal) using Eclipse Model 80-AHO burners. The duct work and collection system was designed and installed by Dec-E-Tech Industrial Design Engineering. The source emits volatile organic compounds and organic solvents (used for clean-up). The UTM coordinates are Zone 17, 461.37 km East and 3142.02 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 sources shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received January 29, 1991.

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Spiralkote, Inc.

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Expiration Date: March 31, 1992

Attachments cont.:

2. Mr. Bruce P. Miller's letter with enclosure ("Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency") dated May 15, 1990.
3. Technical Evaluation and Preliminary Determination dated April 4, 1991.
4. Mr. E. J. Ward Jr.'s letter received April 26, 1991.
5. Revised Technical Evaluation and Preliminary Determination dated May 21, 1991.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee

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GENERAL CONDITIONS:

to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

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Spiralkote, Inc.

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GENERAL CONDITIONS:

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

SPECIFIC CONDITIONS:

1. The source may operate continuously (i.e., 8760 hrs/yr).

2. Total maximum allowable VOC (volatile organic compounds-organic solvents) emission limit shall not exceed 60.0 pounds per "run hour" and 71.3 tons per year, including clean-up solvent less any solvent waste shipped from the source [based on a minimum 70% capture and transport efficiency and a minimum 95% destruction efficiency (oxidizes at least 95% of the VOC measured as total combustible carbon to carbon dioxide and water)]. The 12 month rolling cumulative total VOC emissions from the press shall not exceed 71.3 TPY, calculated on a monthly basis. The VOC emissions will be calculated based on actual daily input and annual test results for capture and destruction. EPA Method 24A shall be utilized to determine the VOC content of the ink pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version).

3. The maximum input to the press is 180 pounds of VOC per "run hour" calculated on a daily basis. The permitted materials are all inks, solvents and coatings similar to those stated in the application.

4. The initial and annual demonstration of the capture efficiency shall be conducted using the U.S. EPA's "Guidelines for Developing a State Protocol for the Measurement of Capture Efficiency" (attached). The permittee shall notify the Department's Central District in writing of the protocol that will be used for the capture efficiency demonstration purpose at least 60 days prior to compliance testing.

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Spiralkote, Inc.

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SPECIFIC CONDITIONS:

5. Initial and annual compliance tests for the actual destruction efficiency (comparison of the inlet and outlet concentrations) of the catalytic incinerator shall be conducted using EPA Method 25, pursuant to F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1990 version). Other test methods may be used as long as prior Department approval has been granted in writing in accordance with F.A.C. Rule 17-2.700(3).

6. A material balance scheme shall be used to assess and report the annual (verifiable monthly) VOC/solvent emissions associated with clean-up. The material balance scheme will account for the VOC/solvents received, any control measures used (must be quantifiable), and any VOC/solvents shipped off the facility by a properly licensed hauler.

7. The Department's Central District office shall be notified in writing at least 15 days prior to conducting compliance tests pursuant to F.A.C. Rule 17-2.700(2).

8. Test reports shall be submitted to the Department's Central District office no later than 45 days after the last sampling run of each test is completed pursuant to F.A.C. Rule 17-2.700(7).

9. This project is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1990 version).

10. The sources are subject to the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operation-Problems.

11. Objectionable odors shall not be allowed off plant property pursuant to F.A.C. Rules 17-2.620(2) and 17-2.600(1)(a)2:

12. Pursuant to F.A.C. Rule 17-2.600(1)(a)1., the catalytic incinerator is subject to the visible emissions standard of "no visible emissions" (5% opacity) except that visible emissions not exceeding 20% opacity are allowed for up to three minutes in any one hour period. Initial and annual compliance tests shall be conducted using DER Method 9 pursuant to Table 700-1, F.A.C. Rule 17-2.700.

13. An annual operating report shall be submitted to the Department's Central District office by March 1 of each calendar year accounting for the annual VOC/solvent emissions, which shall minimally include source test results, quantifiable fugitives and clean-up VOCs/solvents.

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SPECIFIC CONDITIONS:

14. Any change in the method of operation pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Bureau of Air Regulation office.

15. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation office prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

16. An application for an operation permit must be submitted to the Department's Central District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E., Director
Division of Air Resources
Management