

Florida Department of Environmental Protection

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Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Donna T. Vinyard Jr.
Secretary

May 13, 2011

VIA ELECTRONIC MAIL

bnelson@sesfla.com

Mr. Byron Nelson
President
Southern Environmental Sciences, Inc.
1204 N. Wheeler St.
Plant City, FL 33563

Re: Master Packaging Capture Efficiency Testing Protocol Approval
Air Construction Permit No. 0570293-022-AC

Dear Mr. Nelson:

The Emissions Monitoring Section (EMS) received Southern Environmental Sciences, Inc.'s (SES) capture efficiency test protocol on behalf of Master Packaging on April 26, 2011. The test protocol submitted for Press 5A and Press 2 contained an alternative sampling procedure request for reducing the sample run time from three hours to one hour. The EMS, working with the Environmental Protection Commission (EPC) of Hillsborough County, approved this procedure and will allow Master Packaging to conduct a three run compliance test with each run lasting a minimum of one hour for Press 5A and Press 2.

Due to the condensed sample time of each test run, EPA Method 204B and 204E will be affected and therefore the data collection procedures for the methods will need to be modified. Method 204B section 8.1.2 and Method 204E section 8.2.2 calls for the velocity to be measured at each site at least once every hour during each sample run using Method 2 or 2A. With the shortened sample run time SES will need to collect three velocity measurements within a one hour period at each site as specified in the method referenced above.

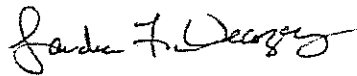
Additionally, while conducting the capture efficiency test on Press 5A, located in the east half of the building enclosure, two adjacent wall fans which typically draw air out of the building are required to be operating in order to capture the VOC's for data analysis most effectively. This was previously discussed in a conference call and agreed upon by EMS, EPC, and SES.

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Press 2, located in the west end of the building enclosure will have at a minimum of two adjacent fans operating during the capture efficiency test. In this section of the building enclosure there are a total of eight wall fans, none of which are routinely used, but in order to capture emissions from Press 2 a sufficient flow rate must be maintained to comply with the requirements in EPA Method 204B and 204E.

If you have any questions, please contact Mr. Syed Arif of my office at 850/717-9039 or by email at syed.arif@dep.state.fl.us.

Sincerely,



Sandra F. Veazey, Chief
Bureau of Air Monitoring and Mobile Sources

SFV/lp

cc: Pamala Vazquez, FDEP Southwest District (pamala.vazquez@dep.state.fl.us)
Sterlin Woodard, EPC Hillsborough County (woodard@epchc.org)