Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castille
Secretary

ELECTRONIC MAIL
robert.garrett@sonoco.com

Robert K. Garrett, Operations Manager
Sonoco Products Company, Inc.
1854 Central Florida Parkway
Orlando, FL 32837

Re: Title V Air Operation Permit
PROPOSED Permit No.: 0950044-007-AV
Orlando Can Coating Facility

Dear Mr. Garrett:

One copy of the PROPOSED PERMIT DETERMINATION for the PROPOSED Title V Air Operation Permit for the Orlando Can Coating Facility located at 1854 Central Florida Parkway, Orlando, Orange County, Florida is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

http://www.dep.state.fl.us/air/eproducts/ards/default.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact Alan Zahm, P.E., at 407/894-7555.

Sincerely,

L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Date 7-31-06

LTK/jt
Enclosures
cc: Jerome J. Guidry, P.E. **(jerome.guidry@att.net)**
Hamp Pridgen, OCEPD **(hamp.pridgen@ocfl.net)**
Caroline Shine, FDEP
Barbara Friday, BAR **[Barbara.Friday@dep.state.fl.us]** (for posting with Region 4, U.S. EPA)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0950044-007-AV

I. Public Notice.

An "INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" to Sonoco Products Company, Inc., located at 1854 Central Florida Parkway, Orlando, Orange County, Florida was clerked on June 6, 2006. The "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT " was published in the **Orlando Sentinel** newspaper on June 19, 2006. The DRAFT Title V Air Operation Permit was available for public inspection at the permitting authority's office in Orlando. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" was received on July 5, 2006.

II. Public Comment(s).

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Permit becomes the PROPOSED Permit.

III. Conclusion.

Since there were no comments received during the Public Notice period, no changes were made to the DRAFT Permit and the permitting authority hereby issues the PROPOSED Permit.

Sonoco Products Company, Incorporated
Facility ID No.: 0950044
Orange County

Title V Air Operation Permit Renewal
PROPOSED Permit Renewal No.: 0950044-007-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334
Fax: 407/897-5963

Title V Air Operation Permit Renewal
Sonoco Products Company, Incorporated
Orlando Can Coating Facility
PROPOSED Permit Renewal No.: 0950044-007-AV

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STATEMENT OF BASIS

Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castille
Secretary

Permittee:
Sonoco Products Company, Incorporated
1854 Central Florida Parkway
Orlando, Florida 32821

PROPOSED Permit Renewal No.: 0950044-007-AV
Facility ID No.: 0950044
SIC Nos.: 34, 3479
Project: Orlando Can Coating Facility

Attn: Robert K. Garrett, Operations Manager

This permit is for the operation of the Orlando Can Coating Facility located at 1854 Central Florida Parkway, Orlando, Orange County; UTM Coordinates: Zone 17, 460.3 km East and 3142.0 km North.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS
APPENDIX SS-1, STACK SAMPLING FACILITIES
Table 297.310-1, CALIBRATION SCHEDULE
APPENDIX CAM

Renewal Effective Date:	**to be determined**
Renewal Application Due Date:	**February 28, 2011**
Expiration Date:	**August 30, 2011**

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/jt

Section I. Facility Information.

Subsection A. Facility Description.

The facility manufactures composite cans used for packaging products such as frozen juice concentrate. The facility includes a coating line which roll-coats metal plates that are later die-cut into container ends. The process consists of an ultraviolet cured coating followed by an oven cured coating. Metal plates are fed from pallets through roller coaters, and into the drying/curing oven where excess solvents are evaporated. After the plates are allowed to cool they are automatically stacked on a receiving pallet. The process is done through the use of a continuous conveyor.

This facility includes the following emission units:

a) E.U. 001 - Metal Can Coater #1 and Drying Oven #1 equipped with a C.E. air preheater thermal oxidizer incinerator.

b) E.U. 004 – Metal End Department Compounders consisting of multi-die solvent-based compounders 1A & 1B, 2A & 2B, 3A & 3B, and 5A & 5B. The water-based compounders are multi-die 7A & 7B and double-die 1 & 2.

c) E. U. 005 – Can Lines
The lines produce 10, 12, and 16 ounce cans by using a spiral winding machine to produce a continuous composite paper can tube by pulling multiple ribbons of paperboard, synthetic or metallic liner ribbons and pre-printed label ribbons spirally onto and around a long chrome mandrel. As the composite tube leaves the mandrel, an oscillating cutter cuts the tube to specified lengths depending on the size of can desired. A lubricant, which is a source of volatile organic compounds (VOCs) is applied to the container line and a glue which is less than 0.2 percent VOC is used to seal the containers.

Also included in this permit are miscellaneous insignificant emission units and/or activities.

Based on construction permit 0950044-006-AC issued August 30, 2005 and the Title V permit renewal application received February 27, 2006, this facility is **not** a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Metal Can Coater #1 and #1 Drying Oven
004	Metal End Department Compounders
005	Can Lines

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History/ID Number Changes
Statement of Basis

These documents are on file with permitting authority:
Renewal Title V Permit Application received February 27, 2006.
Additional Information Requested March 13, 2006.
Application for a Construction Permit received February 25, 2005.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a) The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

b) The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor

emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:

a) tightly cover or close all VOC containers when they are not in use,
b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
c) maintain all piping, valves, fittings, etc. in good operating condition,
d) prevent excessive air turbulence across exposed VOC's,
e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal. [Rule 62-296.320(1)(a), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

7. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Orange County Environmental Protection Division and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. &3., F.A.C. (see Condition 51 of APPENDIX TV-5, TITLE V CONDITIONS)}

9. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Orange County Environmental Protection Division
800 Mercy Drive, Suite 4
Orlando, Florida 32808-7850
Telephone: 407/836-1400; Fax: 407/836-1499

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

11. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year **on or before March 1** of the following year and submitted to the Orange County Environmental Protection Division. [Rule 62-210.370(3), F.A.C.]

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62.213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No./ Brief Description
001 Metal Can Coater #1 and Drying Oven #1

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. Capacity. The maximum VOC usage is 355.4 tons per consecutive twelve months.
[Rule 62.210.200, (PTE), F.A.C., Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

A2. Fuels. The oven and thermal oxidizer shall fire only natural gas.
[Permit 0950044-002-AC, Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

A3. Methods of Operation. The VOC/HAP destruction efficiency of the thermal oxidizer shall be at least 90 percent across the unit.
[Rule 62.210.200, (PTE), F.A.C., Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

A4. Hours of Operation. The unit is allowed to operate continously.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

Emission Limitations and Standards

A7. The visible emissions must comply with Rule 62-296.320(4)(b)(1), F.A.C., and are limited to less than 20 percent opacity.

A8. The **facility-wide** maximum permitted emissions of VOCs shall be less than 249 tons per consecutive twelve months, total HAPs shall be less than 25 tons per consecutive twelve months and any individual HAP shall be less than 10 tons per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950044-006-AC, Title V renewal application received February 27, 2006]

Test Methods and Procedures

A9. The unit shall demonstrate compliance with its visible emission limit in accordance with DEP Method 9 prior to permit expiration date. The test period shall be a minimum of 60 minutes.
[Rules 62-297.401, 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

A10. The compliance test for the VOC removal efficiency comparison of the inlet and outlet concentrations of the thermal oxidizer shall be conducted prior to permit expiration date in accordance with EPA Method 25 or Method 25a for the outlet. The inlet VOC shall be determined by using the VOCs of the coating materials as measured by EPA Method 24. The Department may accept, in place of EPA Method 24, a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings."
[Rules 62-297.401(25); 62-297.401(24); 62-296.500(2)(b)4.; and 62-297.310(7)(a)4.b., F.A.C]

Recordkeeping and Reporting Requirements

A11. In order to demonstrate compliance with conditions no. A1, A3, A8, and Appendix CAM, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Daily
a) day
b) thermal oxidizer temperature and strip chart recorder check
Monthly
a) month
b) consecutive 12 month total of material usage, VOC usage, and **facility-wide** VOCs, total HAPs, and individual HAP emissions
c) thermal oxidizer's low temperature visible alarm and coater vacuum shut off check
Biannually
a) date
b) strip chart recorder temperature calibration
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

Section III. Emissions Unit(s).

Subsection B. This section addresses the following emissions unit:

E.U. ID / Brief Description

004 – Metal End Department Compounders consisting of multi-die solvent-based compounders 1A & 1B, 2A & 2B, 3A & 3B, and 5A & 5B. The water based compounders are multi-die 7A & 7B and double-die 1 & 2.

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B1. Capacity. The maximum VOC usage is 86.29 tons per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

B2. Hours of Operation. The unit is allowed to operate continuously.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950044-006-AC, and Title V renewal application received February 27, 2006]

Emission Limitations and Standards

B3. The maximum daily allowable discharge into the atmosphere of VOC's for VOC containing coatings delivered to the coating applicator are 3.7 pounds of VOC per gallon of coating less water averaged over all the compounding units.
[Rule 62-296.501(2)(d) F.A.C.]

B4. The **facility-wide** maximum permitted emissions of VOCs shall be less than 249 tons per consecutive twelve months, total HAPs shall be less than 25 tons per consecutive twelve months and any individual HAP shall be less than 10 tons per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C. and Permit 0950044-006-AC]

Recordkeeping and Reporting Requirements

B5. In order to demonstrate compliance with conditions no. B1, B3, and B4, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Daily
a) day
b) lbs. VOC/gal. of coating less water averaged over all the compounding units
Monthly
a) month
b) consecutive 12 month
total of:
- VOC usage
- **facility-wide** VOCs, total HAPs, and individual HAP emissions

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

Section III. Emissions Unit(s).

Subsection C. This section addresses the following emissions unit:

E.U. ID / Brief Description
005 - Can Lines

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

C1. Capacity. The maximum VOC usage is 97 tons per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950044-006-AC, Title V renewal application received February 27, 2006]

C2. Hours of Operation. The unit is allowed to operate continuously.
[Rule 62-210.200 F.A.C., Permit 0950044-006-AC, Title V renewal application received February 27, 2006]

Emission Limitations and Standards

C3. The **facility-wide** maximum permitted emissions of VOCs shall be less than 249 tons per consecutive twelve months, total HAPs shall be less than 25 tons per consecutive twelve months and any individual HAP shall be less than 10 tons per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C. and Permit 0950044-006-AC]

Recordkeeping and Reporting Requirements

C4. In order to demonstrate compliance with conditions no. C1 and C3, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly
a) month
b) consecutive 12 month total of VOC usage, and **facility-wide** VOCs, total HAPs, and individual HAP emissions
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Abbreviations and Acronyms:

°F:	Degrees Fahrenheit
BACT:	Best Available Control Technology
CFR:	Code of Federal Regulations
DEP:	State of Florida, Department of Environmental Protection
DARM:	Division of Air Resource Management
EPA:	United States Environmental Protection Agency
F.A.C.:	Florida Administrative Code
F.S.:	Florida Statute
ISO:	International Standards Organization
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: **[40 CFR 60.334]**

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: **[Rule 62-213, F.A.C.]**

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix H-1, Permit History/ID Number Changes

Sonoco Products Company, Incorporated
Orlando Can Coating Facility

PROPOSED Permit Renewal No.: 0950044-007-AV
Facility ID No.: 0950044

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit Number	Issue Date	Expiration Date	Extended Date[1, 2]	Revised Date(s)
-001	Metal Can Coater and Drying Oven	AC48-34791	2/11/81	2/11/86		11/08/83 11/18/83
		AO48-115503	06/16/86	06/15/91		11/16/87
		AC48-197966	10/08/91	09/25/96		12/11/89
-004	Twelve End Seal Compound Coaters	AC4874475	09/18/84	09/05/85		08/01/96
All	Initial Title V Permit	0950044-001-AV	03/24/98	08/30/01		11/22/00
All	Title V Revision	0950044-002	withdrawn			
-005	Five Juice Container Production Lines	0950044-003-AC	03/31/00	08/30/01		
All	Title V Revision	0950044-004-AV	11/22/00	08/30/01		
All	Title V Renewal	0950044-005-AV	09/17/01	08/30/06		
All	Can Coating Facility	0950044-006-AC	08/30/05	08/30/06		
All	Title V Renewal	0950044-007	TBD			

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Sonoco Products Company, Inc.
Orlando Can Coating Facility

PROPOSED Title V Permit Renewal No. 0950044-007-AV
Facility ID No.: 0950044

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Waste oil storage
2. Hazardous waste storage
3. Water evaporator
4. Facility painting activities
5. Paper beveling and bailing operation

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 3/2/99)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arrestors with a minimum of 3 compatible safety belts available for use by sampling personnel.
2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

APPENDIX TV-5, TITLE V CONDITIONS (version dated 03/28/05)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.
[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations; Applications.
(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.
(2) All applications and supporting documents shall be filed in quadruplicate with the Department.
(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.
(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.
(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.
(b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification.
(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.
(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.
(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.
(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.
(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C.
[Rule 62-4.050, F.A.C.]

TABLE 297.310-1 CALIBRATION SCHEDULE
(version dated 3/2/99)

[Note: This tale is referenced in Rule 62-297.310, F.A.C.]

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded Max. deviation between readings	Micrometer	+/-0.001" men of at least three readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually	Spirometer or calibrated wet test or dry gas test meter	2%
	3. Check after each test series	Comparison check	5%

APPENDIX CAM

Compliance Assurance Monitoring Requirements

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]

2. The attached CAM plan(s) include the following information:
(i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
(ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
(iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.
[40 CFR 64.6(c)(1)]

3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 14.)** and reporting exceedances or excursions (see **CAM Conditions 15. – 16.**).
[40 CFR 64.6(c)(2)]

4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 16.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]

6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]

7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable.

The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.b.,** above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
[40 CFR 64.8(a)]

11. Elements of a QIP:

a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
   (i) Improved preventive maintenance practices.
   (ii) Process operation changes.
   (iii) Appropriate improvements to control methods.
   (iv) Other steps appropriate to correct control performance.
   (v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).

[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
   a. Failed to address the cause of the control device performance problems; or
   b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR 64.8(e)]

<u>40 CFR 64.9 Reporting And Recordkeeping Requirements.</u>

15. <u>General reporting requirements.</u>
   a. Commencing from the effective date of this permit, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
   b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:
      (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
      (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
      (iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

STATEMENT OF BASIS

Sonoco Products Company
Orlando Can Coating Facility
Facility ID No.: 0950044
Orange County

Title V Air Operation Permit Renewal
PROPOSED Permit Renewal No.: 0950044-007-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is to renew the Title V Operation Permit.

This facility includes the following emission units:

a) E.U. 001 - Metal Can Coater #1 and Drying Oven #1 equipped with a C.E. air preheater thermal oxidizer incinerator. The thermal oxidizer provides a minimum VOC/HAP reduction efficiency of 90% of the VOC/HAP delivered to the thermal oxidizer inlet.

b) E.U. 004 – Metal End Department Compounders consisting of multi-die solvent-based compounders 1A & 1B, 2A & 2B, 3A & 3B, and 5A & 5B. The water based compounders are multi-die 7A & 7B and double-die 1 &2.

c) E.U. 005 – Can Lines
The lines produce 10, 12, and 16 ounce cans by using a spiral winding machine to produce a continuous composite paper can tube by pulling multiple ribbons of paperboard, synthetic or metallic liner ribbons and pre-printed label ribbons spirally onto and around a long chrome mandrel. As the composite tube leaves the mandrel, an oscillating cutter cuts the tube to specified lengths depending on the size of can desired. A lubricant, which is a source of volatile organic compounds (VOCs) is applied to the container line and a glue which is less than 0.2 percent VOC is used to seal the containers.

The applicable emission limitations are as follows:

E.U. 001 - incinerator VE limit per Rule 62-296.401(1)(a), F.A.C. and RACT Rule 62-296.501(3)(b), F.A.C. (90% reduction of VOCs across the control device)

E.U. 004 - general VOC standard per Rule 62-296.320(1)(a), F.A.C. and RACT Rule 62-296.501(2)(d), F.A.C. (3.7 lbs of VOC per gallon of coatings)

The permit also includes a facility-wide limit of 249 tons/yr for VOC and less than 10/25 tons/yr or single/combined HAPs. Therefore the facility is major for VOC and a synthetic minor for HAPs and is not subject to a NESHAP.

E.U. 001 includes a CAM Plan as proposed by the applicant in the construction application received February 25, 2005.

Also included in this permit are miscellaneous insignificant emission units and/or activities.