



ENVIRONMENTAL PROTECTION DIVISION

David D. Jones, P.E., CEP, Manager

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Orlando, FL 32803-3727

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(Sent by Electronic Mail – Return Receipt Requested)

Mr. Richard Stephan, Operations Manager
Inteplast Engineered Films
7549 Brokerage Drive
Orlando, FL 32809-5625

Re: Title V Air Operation Permit Revision and Renewal
Proposed Permit No. 0950052-026-AV
Inteplast Engineered Films

Dear Mr. Stephan:

Enclosed is one copy of the proposed permit determination for the revision and renewal of the Title V air operation permit for the Inteplast Engineered Films facility located at 7549 Brokerage Drive, Orlando, Orange County. 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 Resource 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://appprod.dep.state.fl.us/air/emission/apds/default.asp>

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation 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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 should have any questions, please contact John Kasper, at (407) 836-1443 or by email at AirPermitsOrangeCounty@ocfl.net

Executed in Orlando, Florida

 11/3/18

Renee H. Parker (Date)

Environmental Program Supervisor

Air Quality Management

Orange County Environmental Protection Division


(4) JMK/BMB/RHP:kw

Cc: Richard Stephan, rstephan@inteplastef.com
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Ms. Lynn Searce, DEP OPC, lynn.searce@dep.state.fl.us (for posting with EPA)

PROPOSED DETERMINATION

I. PUBLIC NOTICE

An Intent To Issue Air Permit for Inteplast Engineered Films was clerked on November 21, 2017. The Inteplast Engineered Films facility is located in Orange County at 7549 Brokerage Drive, Orange County, Orlando, Florida.

The Public Notice Of Intent To Issue Air Permit was published in the Orlando Sentinel on December 1, 2017. The Draft Title V air operation permit was available for public inspection at the permitting authority's office in Orlando and online at <http://depdms.dep.state.fl.us/Oculus/servlet/login>. Proof of publication of the Public Notice of Intent To Issue Air Permit was received on December 7, 2017.

II. PUBLIC COMMENTS

No comments on the Draft Permit were received from the public, the EPA Region 4 Office, the Florida DEP, or the applicant, during the 30-day public comment period.

III. CONCLUSION

The permitting authority will issue the Proposed Title V Air Operation Permit No. 0950052-026-AV as drafted, to be reviewed by the USEPA.

Inteplast Engineered Films
Facility ID No. 0950052
Orange County

Title V Air Operation Permit Revision and Renewal

Permit No. 0950052-026-AV

(Revision and Renewal of Title V Air Operation Permit No. 0950052-023-AV)



Permitting and Compliance Authority:

State of Florida

Orange County Environmental Protection Division

3165 McCrory Place, Suite 200

Orlando, Florida 32803

Telephone: 407-836-1400

Fax: 407-836-1498

Email: AirPermitsOrangeCounty@ocfl.net

Title V Air Operation Permit Revision and Renewal

Permit No. 0950052-026-AV

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PERMITTEE:

Inteplast Engineered Films
7549 Brokerage Drive
Orlando, FL 32809-5625

Permit No. 0950052-026-AV

Inteplast Engineered Films

Facility ID No. 0950052

Title V Air Operation Permit Revision and Renewal

This purpose of this permit is to revise and renew the Title V air operation permit for the above-referenced facility. The Inteplast Engineered Films facility is located in Orange County at 7549 Brokerage Drive, Orlando, Florida. UTM Coordinates are Zone 17, 459.05 East, 3147.55 North. Latitude is: 28°27'13.9" North; and, Longitude is: 81°25'5.8" West.

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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

0950052-026-AV Effective Date: **DATE, 20xx**

0950052-025-AC Effective Date: December 19, 2017

Renewal Application Due Date: **Exp. DATE -225, 20zz**

Expiration Date: **Eff. DATE + 5 years, 20zz**

Executed in Orlando, Florida

(Proposed)

Reneé H. Parker
Air Quality Management
Environmental Program Supervisor
Orange County Environmental Protection Division

(4) JMK/BMB/RHP:kw

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Inteplast Engineered Films operates a plastic bag manufacturing facility that includes a flexographic printing operation. The printing operation has three flexographic printing presses on site, but only two are operational (Press No. 3 and Press No. 7). The non-operational press (Press No. 6) must pass a compliance test before the facility may resume operation of Press No. 6. Emissions from the printing operation are controlled with a regenerative thermal oxidizer (RTO). Also included in this facility are miscellaneous insignificant emissions units and activities, including the ink storage room and ink mixing station, and the plastic bag manufacturing operation. See Appendix I, List of Insignificant Emissions Units and/or Activities.

Primary pollutants are Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The facility is a Title V major source of VOC and a synthetic minor source of HAP.

Subsection B. Summary of Emissions Units.

This facility consists of one regulated emission unit (EU) described as follows.

EU	Emission Unit Description
001	<p><u>Flexographic Printing Facility</u></p> <p>This emission unit consists of the following equipment.</p> <ol style="list-style-type: none">1. Three Flexographic Presses, each with drying ovens fired with natural gas: Press No. 3: Windmoeller & Hoelscher, Model Novaflex flexographic press Press No. 6: PCMC Model Infinity flexographic press (not operational). This press must pass a compliance test before the facility may resume operation of Press No. 6. Press No. 7: Amut Bielloni Converting, Model Telia FSC 5010 Maxi flexographic press2. One regenerative thermal oxidizer (RTO) manufactured by CMM Group, Model number RTO-15000-M-95. The RTO's minimum combustion chamber operating temperature is 1500°F. The RTO fuel is natural gas, and the burner is rated at 1 MMBTU/hr. The RTO rated loading is 15,000 SCFM with a VOC loading of 4.2 MMBTU/hr. <p>The exhaust emissions of all presses are manifolded together and the exhaust air flow is vented to the RTO. The RTO exhaust stack is 20 feet tall, 2.67 feet diameter, and the exhaust gas temperature is approximately 250°F. The presses are fully enclosed in a room that may be used as a temporary total enclosure if it meets the requirements of EPA Method 204, Criteria for and Verification of a Permanent or Temporary Total Enclosure.</p>

Subsection C. Applicable Regulations.

This facility is subject to Rule 62-296.500, F.A.C., Reasonably Available Control Technology (RACT) - Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities, and Rule 62-296.515, F.A.C, Graphic Arts Systems.

This facility is subject to 40 CFR Part 63 Subpart A, General Provisions, and 40 CFR Part 63 Subpart KK, National Emission Standard for the Printing and Publishing Industry. The facility is an area (synthetic minor) source of HAP and meets the requirements of 40 CFR Part 63 Subpart KK §63.820(a)(2), so it is only subject to the recordkeeping requirements of §63.829(d) and the reporting requirements of §63.830(b)(1). The reporting requirements of §63.830(b)(1) were met by construction permit 0950052-020-AC.

Based on the Title V air operation permit application received August 30, 2017, this facility **is not a major** source of HAP. A summary of applicable regulations is shown in the following table.

SECTION I. FACILITY INFORMATION.

Regulation	EU Nos.
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A- General Provisions	001
40 CFR 63, Subpart KK - National Emission Standard for the Printing and Publishing Industry	001
40 CFR 64, Compliance Assurance Monitoring (CAM)	001
<i>State Rule Citations</i>	
Rule 62-4.070, F.A.C., Standards for Issuing or Denying Permits; Issuance; Denial	001
Rule 62-4.090, F.A.C., Renewals	001
Rule 62-204.800, F.A.C., Federal Regulations Adopted by Reference	001
Rule 62-210.200, F.A.C., Definitions	001
Rule 62-210.370, F.A.C., Emissions Computation and Reporting	001
Rule 62-213.440, F.A.C., Permit Content	001
Rule 62-213.900, F.A.C., Forms and Instructions	001
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	001
Rule 62-296.500, F.A.C., Reasonable Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities	001
Rule 62-296.515, F.A.C., Graphic Arts Systems	001
Rule 62-297.310, F.A.C., General Emissions Test Requirements	001
Rule 62-297.450, F.A.C., EPA VOC Capture Efficiency Test Procedures	001
<i>Orange County Ordinance Citations</i>	
Orange County Code of Ordinances, Chapter 15, Article III, Air Quality Control	001

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW.1. Appendices. The permittee shall comply with all documents identified in Section IV. Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

FW.2. Not Federally Enforceable. Orange County Ordinances. All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

Emissions and Controls

FW.3. Not Federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere that by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) & 62-210.200(Definitions), F.A.C.]

FW.4. General 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 or organic solvents without applying known and existing vapor To comply, procedures to minimize pollutant emissions shall include the following:

- Tightly cover or close all VOC containers when they are not in use;
- Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
- Maintain all piping, valves, fittings, etc. in good operating condition;
- Prevent excessive air turbulence across exposed VOCs; and
- 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., and Permit No. 0950052-020-AC]

FW.5. General Visible Emissions. No person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW.6. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but are not limited to the following:

- Paving and maintenance of roads, parking areas and yards.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Other techniques as necessary.

[Rule 62-296.320(4)(c), F.A.C.]

Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

SECTION II. FACILITY-WIDE CONDITIONS.

FW.7. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rules 62-210.370(3), 62-210.900, & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}

FW.8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. (See also Appendix RR, Conditions RR1 and RR7.) [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

FW.9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: <https://cdx.epa.gov>. Information on electronically submitting risk management plans using the Central Data Exchange system is

SECTION II. FACILITY-WIDE CONDITIONS.

available at: <http://www2.epa.gov/rmp>. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

- b. 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]

FW.10. Supporting Documentation. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The documents shall be kept at the facility for at least 5 years and made available to the EPD. [Rules 62-4.070(3) & 62-213.440(1)(b)2., F.A.C.]

FW.11. Semi-Annual Monitoring Reports. The permittee shall monitor compliance with the terms and conditions of this permit and shall submit reports of any deviations from the requirements of these conditions at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports, including reference to the specific requirement and the duration of such deviation. All reports shall be accompanied by a certification by a responsible official, pursuant to subsection 62-213.420(4), F.A.C. (See also Conditions RR2. – RR4. of Appendix RR, Facility-wide Reporting Requirements, for additional reporting requirements related to deviations.) [Rule 62-213.440(1)(b)3.a., F.A.C.]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS. (DRAFT)

Subsection A. Emission Unit 001

The specific conditions in this section apply to the following emission unit:

This printing facility consists of one regulated emission unit (EU) described as follows.

EU No.	Emission Unit Description
001	Flexographic Printing Facility

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. The facility is allowed to operate continuously. [Rule 62-210.200(PTE), F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

{Permitting Note: The usage limits for ink and ink solvent in Permits Nos. 0950052-020-AC, 0950052-023-AV, and 0950052-024-AC, were removed by Permit No. 0950052-025-AC. See Technical Evaluation and Preliminary Determination for Permit No. 0950052-025-AC.}

A.2. Methods of Operation. The RTO is permitted to fire natural gas only. [Rule 62-210.200(PTE), F.A.C., and Permit No. 0950052-020-AC]

A.3. Oxidizer Destruction Efficiency. The RTO shall oxidize at least 90 percent of the volatile organic compounds (VOC measured as total combustible carbon) to carbon dioxide and water. [Rule 62-296.515(2)(a)3., F.A.C., and Permit No. 0950052-020-AC]

A.4. Oxidizer Combustion Chamber Temperatures.

- The combustion chamber operating temperature shall be recorded continuously.
- The minimum combustion chamber set-point temperature shall be 1525°F.
[Rule 62-4.070(3), F.A.C., and Permit No. 0950052-020-AC]

Emission Limitations and Standards

A.5. Visible Emissions Standard. The visible emissions from the oxidizer stack are limited to less than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

A.6. VOC and HAP Emissions Standards.

- VOC emissions shall not exceed 225 tons in any consecutive 12-month period.
- Individual HAP emissions shall not exceed 5.0 tons in any consecutive 12-month period.
- Combined HAP emissions shall not exceed 10.0 tons in any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.; 40 CFR Part 63 Subpart KK §63.820(a)(2); and Permit No. 0950052-025-AC]

Monitoring of Operations

A.7. CAM Plan. EU 001 is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(8)(c), F.A.C. [40 CFR Part 64; Rules 62-204.800 & 62-213.440(1)(b)1.a., F.A.C.]

Test Methods and Procedures

A.8. Compliance Tests for Operation Permit Renewal. Demonstration of the capture efficiency and destruction efficiency shall be conducted prior to the operation permit expiration date. The permittee shall notify the EPD in writing of the test date, and provide the protocol that will be used for the capture efficiency and destruction efficiency demonstration, at least 30 days prior to compliance testing. The notification must include the following information: the date, time, and location of each

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS. (DRAFT)

Subsection A. Emission Unit 001

test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test. Tests shall be conducted in accordance with the applicable requirements specified in Appendix TR (Facility-Wide Testing Requirements) of this permit. [Rules 62-297.310(8)(b) & 62-297.450, F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

A.9. Destruction Efficiency Testing. The test method for volatile organic compounds shall be EPA Method 25, as described at 40 C.F.R. Part 60, Appendix A-7, adopted and incorporated by reference at Rule 62-204.800, F.A.C., or Attachment 3 of EPA 450/ 2-78-041, Alternate Test Method for Direct Measurement of Total Gaseous Organic Compounds Using a Flame Ionization Analyzer, adopted with equipment specifications per Industrial Ventilation Manual, and incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.515(3)(b)1., F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

A.10. Capture Efficiency Testing. The test method for volatile organic compounds shall be EPA VOC Capture Efficiency Test Procedures listed in Rule 62-297.450, F.A.C. Capture efficiency testing shall be performed according to the Alternate Sampling Procedure in Appendix ASP. [Rules 62-296.515(3)(b)1. & 62-297.450, F.A.C.; Alternate Sampling Procedure, FDEP File Number 11-F-AP; and Permit Nos. 0950052-020-AC & 0950052-024-AC]

A.11. Test Methods. Compliance with the emissions standards shall be determined by the following reference EPA Methods.

EPA Method	Description of Method and Comments
1	Sample and Velocity Traverses from Stationary Sources
2	Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)
3A	Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)
4	Determination of the Moisture Content in Stack Gases
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
204	Criteria for and Verification of a Permanent or Temporary Total Enclosure.
204B	Volatile Organic Compounds Emissions in Captured Stream
204E	Volatile Organic Compounds Emissions in Uncaptured Stream from Building Enclosure

The above methods are described in Appendix A of 40 CFR Part 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from EPD. [Rules 62-204.800 & 62-4.070(3), F.A.C.; Permit Nos. 0950052-020-AC & 0950052-024-AC; and Appendix A of 40 CFR Part 60]

A.12. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS. (DRAFT)

Subsection A. Emission Unit 001

A.13. Required Emissions Testing Facilities. The permittee shall provide emissions testing facilities that meet the requirements of 40 CFR 60.8(e), adopted and incorporated in Rule 62-204.800, F.A.C. The permittee may use permanent or temporary emissions testing facilities. If the permittee chooses to use temporary emissions testing facilities on an emissions unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the EPD and remain on the emissions unit until the test is completed. [Rule 62-297.310(7), F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

Recordkeeping and Reporting Requirements

A.14. Test Reports. The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix RR (Facility-Wide Reporting Requirements) of this permit. [Rule 62-297.310(10), F.A.C. & Permit No. 0950052-024-AC]

A.15. Emissions Calculations. The VOC emissions shall be calculated based on actual monthly input and the most recent test results for capture efficiency and destruction efficiency. [Rule 62-4.070(3), F.A.C., and Permit No. 0950052-020-AC]

A.16. Recordkeeping Requirements. In order to demonstrate compliance with Specific Conditions **A.4.**, **A.6.**, 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 monthly log shall be completed by the end of the following month. The log shall contain the following:

- a. Month and year of record.
- b. Monthly and consecutive 12-month totals of ink solvent (VOC) usage in tons.
- c. Monthly and consecutive 12-month totals of ink usage in tons.
- d. Monthly and consecutive 12-month totals of VOC emissions in tons.
- e. Monthly and consecutive 12-month totals of individual and combined HAP emissions in tons.
- f. Monthly records of all required measurements and calculations needed to demonstrate compliance with specific conditions **A.6.b.** and **A.6.c.**, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used.
- g. Oxidizer combustion chamber operating temperature, °F.
- h. Oxidizer combustion chamber set point temperature, °F.

[Rules 62-4.070(3) & 62-213.440(1)(b)2., F.A.C.; 40 CFR Part 63 Subpart KK §63.829(d); and Permit Nos. 0950052-020-AC & 0950052-024-AC]

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix CAM, Compliance Assurance Monitoring
Appendix ASP, Alternate Sampling Procedure.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Abbreviations and Acronyms:

°F: degrees Fahrenheit	kPa: kilopascals
acfm: actual cubic feet per minute	kW: kilowatts
AOR: Annual Operating Report	LAT: Latitude
ARMS: Air Resource Management System (Department's database)	lb: pound
BACT: best available control technology	lbs/hr: pounds per hour
BHP: brake horsepower	LONG: Longitude
Btu: British thermal units	MACT: maximum achievable technology
CAA: Clean Air Act	mm: millimeter
CAAA: Clean Air Act Amendments of 1990	MMBtu: million British thermal units
CAM: compliance assurance monitoring	MSDS: material safety data sheets
CEMS: continuous emissions monitoring system	MW: megawatt
cfm: cubic feet per minute	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CFR: Code of Federal Regulations	NO_x: nitrogen oxides
CI: compression ignition	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	O₂: oxygen
DARM: Division of Air Resource Management	ORIS: Office of Regulatory Information Systems
DCA: Department of Community Affairs	OS: Organic Solvent
DEP: Department of Environmental Protection	Pb: lead
Department: Department of Environmental Protection	PM: particulate matter
dscfm: dry standard cubic feet per minute	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
EPA: Environmental Protection Agency	PSD: prevention of significant deterioration
EPD: Orange County Environmental Protection Division	psi: pounds per square inch
ESP: electrostatic precipitator (control system for reducing particulate matter)	PTE: potential to emit
EU: emissions unit	RACT: reasonably available control technology
F.A.C.: Florida Administrative Code	RATA: relative accuracy test audit
F.D.: forced draft	RICE: reciprocating internal combustion engine
F.S.: Florida Statutes	RMP: Risk Management Plan
FGR: flue gas recirculation	RO: Responsible Official
Fl: fluoride	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
g: grams	SI: spark ignition
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SOA: Specific Operating Agreement
HP: horsepower	SO₂: sulfur dioxide
Hg: mercury	TPH: tons per hour
ICE: internal combustion engine	TPY: tons per year
I.D.: induced draft	UTM: Universal Transverse Mercator coordinate system
ID: identification	VE: visible emissions
ISO: International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure.)	VOC: volatile organic compounds
	x: By or times

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

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	refers to Title 40
CFR	refers to Code of Federal Regulations
60	refers to Part 60
60.334	refers to Regulation 60.334

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

Example: [Rule 62-213.205, F.A.C.]

Where:

62	refers to Title 62
62-213	refers to Chapter 62-213
62-213.205	refers to Rule 62-213.205, F.A.C.

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
AC53	=	old Air Construction Permit numbering identifying the facility is located in Polk County

APPENDIX CAM
COMPLIANCE ASSURANCE MONITORING REQUIREMENTS
(Version Dated 3/14/2011)

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, as submitted by the applicant, is approved for the purposes of satisfying the requirements of 40 CFR 64.3. [40 CFR 64.6(a)]
2. The attached CAM plan includes the following information:
 - a. The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
 - b. The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
 - c. 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 describes 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 - 9**) and reporting exceedances or excursions (see **CAM Conditions 10 - 14**). [40 CFR 64.6(c)(2)]
4. The permittee is required to conduct the monitoring specified in the attached CAM plan and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5 - 17**). [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

APPENDIX CAM
COMPLIANCE ASSURANCE MONITORING REQUIREMENTS
(Version Dated 3/14/2011)

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. Quality Improvement Plan. 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:
 - (1) Improved preventive maintenance practices.
 - (2) Process operation changes.
 - (3) Appropriate improvements to control methods.
 - (4) Other steps appropriate to correct control performance.
 - (5) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(1)** through **(4)**, above).

[40 CFR 64.8(b)]

12. If a QIP is Required. If 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. Effect of QIP on Existing Requirements. 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)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General Reporting Requirements.

APPENDIX CAM
COMPLIANCE ASSURANCE MONITORING REQUIREMENTS
(Version Dated 3/14/2011)

- a. Commencing from the effective date of this permit, the owner or operator shall submit monitoring reports semi-annually to the compliance authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C. In addition to deviations from any other permit requirement, the semi-annual reports shall also include all instances of deviations from the CAM requirements.
- 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:
 - (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - (2) 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
 - (3) 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. Affect of CAM on Other Requirements. 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]

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

(Version Dated 3/14/2011)

COMPLIANCE ASSURANCE MONITORING PLAN

EU 001 Regenerative Thermal Oxidizer (RTO)

	INDICATOR NO. 1	INDICATOR NO. 2	INDICATOR NO. 3	INDICATOR NO. 4	INDICATOR NO. 5
I. Indicator	RTO combustion zone temperature	Exhaust damper positions	Static pressure at RTO inlet measured with a differential pressure gauge	Work practice / inspection	Compliance test
Measurement Approach	Continuously record the combustion zone thermocouple reading	Visually inspect exhaust damper position	Continuously record the RTO inlet pressure	Inspect internal and external structural integrity and systems operation	Conduct compliance test prior to operation permit renewal
II. Indicator Range (Note: During the August 10, 2017, compliance test, the minimum RTO combustion chamber temperature was greater than 1600°F, with a set point temperature of 1525°F)	An excursion is defined as a temperature reading at least 50°F less than the minimum RTO combustion chamber temperature demonstrated during the most recent compliance test, or a one hour moving average temperature less than 1425°F, whichever is lower, excluding periods of startup, shutdown and malfunction.	An excursion is a damper position that would allow press process VOC emissions to exhaust without thermal treatment.	An excursion is defined as less than -3.0 inches H ₂ O	An excursion is defined as failure to perform an annual inspection, or a determination of improper systems operation or structural failure.	An excursion is defined as a failure to meet permit requirements during a compliance test.
Corrective Action	Each excursion triggers an inspection and assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action, and a reporting requirement.

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

(Version Dated 3/14/2011)

	INDICATOR NO. 1	INDICATOR NO. 2	INDICATOR NO. 3	INDICATOR NO. 4	INDICATOR NO. 5
III. Performance Criteria					
A. Data Representativeness	The thermocouple used to measure the combustion zone temperature shall be accurate to within 5° F.	Properly positioned dampers will assure the press exhaust will reach the thermal oxidizer.	The pressure gauge used to measure the RTO inlet suction shall be accurate to within 2% of full scale.	Inspections of the RTO structure and systems will identify problems.	A test protocol prepared by the permittee shall be approved by the EPD prior to conducting the compliance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media	Maintain the damper position control monitoring equipment as required to effectively exhaust the press exhaust to the thermal oxidizer. Record inspections and adjustments	Pressure recorded on chart paper or electronic media.	Inspection records	Not applicable
C. Quality Assurance and Control Practices and Criteria	Calibrate thermocouple annually. Digital display accurate to within 5° F, chart recorder accurate to within 20° F.	Instruments and controls shall be calibrated and maintained according to the facility schedule.	Operate and maintain pressure indicator as per manufacturer's specifications; calibrate pressure gauge semi-annually	Not applicable	EPA test procedures approved in test protocol.
D. Monitoring Frequency	Measured continuously.	Damper position shall be visually inspected once per shift.	Measured continuously.	Quarterly inspection of external structure and systems operation, annual inspection of internal structure.	Prior to operation permit renewal (5 years)

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

(Version Dated 3/14/2011)

	INDICATOR NO. 1	INDICATOR NO. 2	INDICATOR NO. 3	INDICATOR NO. 4	INDICATOR NO. 5
E. Data Collection Procedure	Recorded continuously on a chart recorder, or at least every 15 minutes on electronic media	Recorded results of inspections and observations	Continuously recorded on a digital recorder	Recorded results of inspections and observations	See approved test methods.
F. Averaging Period	One hour rolling average	Not applicable	Not applicable	Not applicable	Not applicable
IV. Records and Reports					
A. Recordkeeping	Maintain records of chart recorder paper or electronic media, and records of corrective actions taken in response to excursions, for 5 years.	Maintain inspection records and bypass reports and any corrective action for 5 years. Records must be made available upon request.	Maintain records of inspections and records of corrective actions taken in response to excursions, for 5 years.	Maintain records of inspections and records of corrective actions taken in response to excursions, for 5 years.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions in response to excursions.
B. Reporting	Number, duration, and cause of any excursion and the corrective action taken.	Number, duration, and cause of any excursion and the corrective action taken.	Number, duration, and cause of any excursion and the corrective action taken.	Number, duration, and cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to EPD 30 days prior to test date. Submit test report 45 days after conducting a compliance test.
C. Frequency	Semiannually	Semiannually	Semiannually	Semiannually	For each compliance test conducted.

APPENDIX ASP
Alternate Sampling Procedure



**Florida Department of
Environmental Protection**

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

August 4, 2011

Mr. Bruno Ferraro, President
Grove Scientific & Engineering Company
6140 Edgewater Drive Suite F
Orlando, Florida 32810-4810

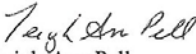
Re: ASP request for Niaflex Corporation
Capture Efficiency Test for Presses 1-5
Construction Permit No. 0950052-019-AC

Dear Mr. Ferraro:

The Office of Permitting and Compliance received your request on behalf of Niaflex Corporation seeking approval for an alternative sampling procedure for destruction efficiency and capture efficiency testing of Presses 1, 2, 3, 4, and 5. Currently, the permit requires a minimum of three sampling runs with each run covering at least one complete production cycle, but shall be at least 3 hours long. The sampling time for each run need not exceed 8 hours, even if the production cycle has not been completed.

Niaflex wishes to shorten the capture efficiency sample run time from three hours to one hour due to the limitations on the amount of work available to perform the test as specified in Rule 62-297.620, F.A.C. Niaflex also wishes to use aggregate sampling for the destruction efficiency and capture efficiency compliance test. The Office of Permitting and Compliance has reviewed Niaflex Corporation's request and approved the alternatives to the requirements of the facilities permit. If you have any questions, please write or call me at 850/717-9033.

Sincerely,



Leigh-Ann Pell
Office of Permitting and Compliance

cc: John Kasper, OCEPD: John.Kasper@ocfl.net
Caroline Shine, FLDEP Central District: Caroline.Shine@dep.state.fl.us
David McNeal, EPA Region IV: mcneal.dave@epa.gov
Sara Greivell: sara@grovescientific.com

www.dep.state.fl.us

APPENDIX ASP
Alternate Sampling Procedure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:)	Permit No.: 0950052-019-AC
)	
Niaflex Corporation)	
)	
Petitioner)	File No.: 11-F-AP

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), Grove Scientific & Engineering Company, has submitted for approval an alternate testing procedure request for Printing Press No. 1, 2, 3, 4 and 5 on behalf of Niaflex Corporation (Petitioner) from requirements in the Air Construction Permit. The Petitioner requested approval to use an one hour capture efficiency test run in lieu of the three hour sampling run required by EPA Method 204B and 204E using the building as an enclosure. The Petitioner also requested the use of aggregate sampling to meet the requirements of the destruction efficiency test and capture efficiency test.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. Niaflex initially submitted an Alternate Sampling Procedure request on June 14, 2011, to Orange County Environmental Protection Division for capture efficiency testing required in the Air Construction Permit No. 0950052-010-AC. The original request was forwarded to the Department on July 15, 2011.
2. Niaflex is a synthetic minor source flexographic printing operation which also makes plastic bags. The primary VOC pollutant is isopropanol, which is used as a solvent for the inks. The facility recently replaced the catalytic incinerator with a regenerative thermal oxidizer to control VOC emissions from the five presses.
3. The Petitioner modified the printing house building to comply with EPA Method 204. An exhaust fan has been permanently installed to allow for the capture of fugitive VOC's and to exhaust these emissions through a permanent stack located outside the building.
4. Due to limitations on the amount of work available to be performed and the time necessary to complete the analysis, Grove Scientific & Engineering Company requested a one hour verses three hour sample run time be granted in lieu of three test runs consisting of three hours each as described in Rules 297.450(2)(a) through (d) F.A.C. The authorization of aggregate sampling as described in EPA document GD-035 Section 4.1 would also add further flexibility in determining capture efficiency thereby relaxing some of the financial burden on the Petitioner.

APPENDIX ASP
Alternate Sampling Procedure

5. Niaflex's request for an alternative sampling procedure approval for destruction efficiency testing and capture efficiency testing included five presses at the printing facility. Niaflex's permit does not address individual press capture efficiency percentages only reasonable assurance documentation regarding capture efficiency. Furthermore, the destruction efficiency of the regenerative thermal oxidizer shall be at least 90 percent. The restrictions and limitations apply in order to ensure compliance with the VOC Potential to Emit but are not press specific restrictions; therefore aggregate sampling will not alter nor impede permitted capture efficiency compliance testing.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Petitioner has provided sufficient justification that the use of aggregate sampling while conducting three test runs consisting of a one hour sample time per run on Press 1, Press 2, Press 3, Press 4, and Press 5 will provide adequate emissions data for the capture efficiency calculations.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. Press 1, Press 2, Press 3, Press 4, and Press 5 capture efficiency tests will employ aggregate sampling and will consist of three sample runs with each run lasting a minimum of one hour. Due to the condensed sample time of each test run, EPA Methods 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 EPA Method 2 or 2A. With the shortened sample run time the facility will need to collect three velocity measurements within a one hour period at each site as specified in the method referenced above.

2. This Order shall not abrogate the Petitioner's obligation to comply with any periodic monitoring requirements established pursuant to the provisions of the Federal Clean Air Act (42 USC 1857, et seq) as amended in 1990.

3. The Petitioner shall incorporate this order into the permit at the next opening for revision or renewal.

4. If an application to incorporate this order into the permit at the next opening for revision or renewal is not made, this order shall expire on August 03, 2016.

5. When incorporated into the permit, this order shall remain in effect until the underlying rule requirement for this order is modified or changed. At that time the Petitioner shall submit a new request, if required, in accordance with Rule 62-297.620, F.A.C., "**Exceptions and Approval of Alternate Procedures and Requirements**", to the Office of Permitting and Compliance.

APPENDIX ASP
Alternate Sampling Procedure

PETITION FOR ADMINISTRATIVE REVIEW

The Department's Proposed Agency Action will become final upon expiration of the petition period described below unless a timely petition for an Administrative Hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Proposed Agency Action may petition for an Administrative Proceeding (hearing) under Sections 120.569 and 120.57 of the 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 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 21 days of receipt of this Notice of Intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within 21 days of publication of the Public Notice or within 21 days of receipt of this notice, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for Notice of Agency Action may file a petition within 21 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an Administrative Determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a Motion in Compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

APPENDIX ASP
Alternate Sampling Procedure

Because the Administrative Hearing process is designed to formulate Final Agency Action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

NOTICE OF APPEAL RIGHTS

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

DONE AND ORDERED this 4th day of August, 2011 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jeffery F. Koerner, P.E.
Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Mail Station 5505
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 717-9000

APPENDIX ASP
Alternate Sampling Procedure

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Synn Science *August 4, 2011*
(Clerk) (Date)

File No.: 11-F-AP

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APPENDIX I

LIST OF INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 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 Rules 62-210.300(3)(a) and (b)1., 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 Rules 62-210.300(3)(a) and (b)1., 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. Ink storage room
2. Ink mixing station
3. Plastic bag manufacturing operation

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RR1. This table summarizes information for convenience purposes only. It does not supersede any of the terms or conditions of this permit.

Report	Reporting Deadline(s)	Related Condition(s)
Plant Problems/Permit Deviations	Immediately upon occurrence (See RR2.d.)	RR2, RR3
Malfunction Excess Emissions Report	Quarterly (if requested)	RR3
Semi-Annual Monitoring Report	Every 6 months	RR4
Annual Operating Report	April 1	RR5
EAOR Title V Annual Emissions Fee Invoice and Fee Payment	April 1	RR6
Annual Statement of Compliance	Within 60 days after the end of each calendar year (or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement); and Within 60 days after submittal of a written agreement for transfer of responsibility, or Within 60 days after permanent shutdown.	RR7
Notification of Administrative Permit Corrections	As needed	RR8
Notification of Startup after Shutdown for More than One Year	Minimum of 60 days prior to the intended startup date or, if emergency startup, as soon as possible after the startup date is ascertained	RR9
Permit Renewal Application	225 days prior to the expiration date of permit	TV18
Test Reports	Maximum 45 days following compliance tests	TR8

{Permitting Note: See permit Section III. Emissions Units and Specific Conditions, for any additional Emission Unit-specific reporting requirements.}

RR2. Reports of Problems.

- a. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.
 - b. 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:
 - (1) A description of and cause of noncompliance; and
 - (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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.
 - c. 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 the 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.
 - d. "Immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays; and, for purposes of Rule 62-4.160(15) and 40 CFR 70.6(a)(3)(iii)(B), "promptly" or "prompt" shall have the same meaning as "immediately".
- [Rules 62-4.130, 62-4.160(8), 62-4.160(15), and 62-213.440(1)(b), F.A.C.; 40 CFR 70.6(a)(3)(iii)(B)]

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RR3. Reports of Deviations from Permit Requirements. The permittee shall report in accordance with the requirements of Rule 62-210.700(5), F.A.C. (below), and Rule 62-4.130, F.A.C. (condition RR2.), deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

Rule 62-210.700(5): In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. (See condition RR2.). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rules 62-213.440(1)(b)3.b., and 62-210.700(5)F.A.C.]

RR4. Semi-Annual Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. [Rule 62-213.440(1)(b)3.a., F.A.C.]

RR5. Annual Operating Report. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rules 62-210.370(2) & (3), 62-210.900 and 62-213.440(3)(a)2., F.A.C.]

RR6. EAOR Title V Annual Emissions Fee Invoice and Fee Payment. Each Title V source permitted to operate in Florida must pay between January 15 and April 1 of each year, an annual emissions fee in an amount determined as set forth in Rule 62-213.205(1), F.A.C.

- a. If the Department has not received the fee by March 1 of the year following the calendar year for which the fee is calculated, the Department will send the primary responsible official of the Title V source a written warning of the consequences for failing to pay the fee by April 1. If the fee is not postmarked or electronically submitted by April 1 of the year due, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee unpaid plus interest on such amount computed in accordance with Section 220.807, F.S. If the Department determines that a submitted fee was inaccurately calculated, the Department shall either refund to the permittee any amount overpaid or notify the permittee of any amount underpaid. The Department shall not impose a penalty or interest on any amount underpaid, provided that the permittee has timely remitted payment of at least 90 percent of the amount determined to be due and remits full payment within 60 days after receipt of notice of the amount underpaid. The Department shall waive the collection of underpayment and shall not refund overpayment of the fee, if the amount is less than one percent of the fee due, up to \$50.00. The Department shall make every effort to provide a timely assessment of the adequacy of the submitted fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.
- b. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five years and shall be made available to the Department upon request.
- c. A copy of the EAOR Title V Annual Emissions Fee Invoice generated by the electronic annual operating report (EAOR) application, must be submitted along with the annual emissions fee payment.

[Rules 62-210.370(3), 62-210.900 and 62-213.205, F.A.C.]

RR7. Annual Statement of Compliance.

- a. The permittee shall submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C., using DEP Form No. 62-213.900(2). Such statement shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C., for Title V requirements and with Rule 62-214.350, F.A.C., for Acid Rain requirements. Such statements shall be submitted (postmarked) to the Department and EPA:
 - (1) Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement; and

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- (2) Within 60 days after submittal of a written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under Chapter 62-213, F.A.C.; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as applicable.
 - b. In lieu of individually identifying all applicable requirements and specifying times of compliance with, non-compliance with, and deviation from each, the responsible official may use DEP Form No. 62-213.900(2) as such statement of compliance so long as the responsible official identifies all reportable deviations from and all instances of non-compliance with any applicable requirements and includes all information required by the federal regulation relating to each reportable deviation and instance of non-compliance.
 - c. The responsible official may treat compliance with all other applicable requirements as a surrogate for compliance with Rule 62-296.320(2), Objectionable Odor Prohibited.
- [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

RR8. Notification of Administrative Permit Corrections.

A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- a. Typographical errors noted in the permit;
 - b. Name, address or phone number change from that in the permit;
 - c. A change requiring more frequent monitoring or reporting by the permittee;
 - d. A change in ownership or operational control of a facility, subject to the following provisions:
 - (1) The Department determines that no other change in the permit is necessary;
 - (2) The permittee and proposed new permittee have submitted an Application for Transfer of Air Permit, and the Department has approved the transfer pursuant to Rule 62-210.300(7), F.A.C.; and
 - (3) The new permittee has notified the Department of the effective date of sale or legal transfer.
 - e. Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), adopted and incorporated by reference at Rule 62-204.800, F.A.C., and changes made pursuant to Rules 62-214.340(1) and (2), F.A.C., to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
 - f. Changes listed at 40 CFR 72.83(a)(11) and (12), adopted and incorporated by reference at Rule 62-204.800, F.A.C., to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 62-210.360(1)(e), F.A.C.; and
 - g. Any other similar minor administrative change at the source.
- [Rule 62-210.360, F.A.C.]

RR9. Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

- a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
- b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

RR10. Report Submission. Except as provided in Rule 62-297.310(10), F.A.C., the permittee shall submit all compliance related notifications and reports required of this permit to the Compliance Authority. {See front of permit for address and phone number.} [Rules 62-4.130, 62-4.160 and 62-213.440, F.A.C.]

RR11. EPA Report Submission. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to: Air, Pesticides & Toxics Management Division, United States Environmental Protection Agency, Region 4, Sam Nunn Atlanta Federal Center, 61 Forsyth Street SW, Atlanta, GA 30303-8960. Phone: 404/562-9077.

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- RR12. Acid Rain Report Submission.** Acid Rain Program Information shall be submitted, as necessary, to: Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Phone: 850/717-9000 Email: DARM_Permitting@dep.state.fl.us.
- RR13. Report Certification.** All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C. [Rule 62-213.440(1)(b)3.c, F.A.C.]
- RR14. 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.]
- RR15. Confidential Information.** Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA. Any permittee may claim confidentiality of any data or other information by complying with this procedure. [Rules 62-213.420(2), and 62-213.440(1)(d)6., F.A.C.]
- RR16. Forms and Instructions.** The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The forms are listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resource Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, by contacting the appropriate permitting authority or by accessing the Department's web site at: <http://www.dep.state.fl.us/air/rules/forms.htm>.
- a. Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) (Effective 12/31/2013)
 - b. Statement of Compliance Form (Effective 06/02/2002).
 - c. Responsible Official Notification Form (Effective 06/02/2002).
- [Rule 62-213.900, F.A.C.: Forms (1), (7) and (8)]

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Unless otherwise specified in a specific rule, this permit, or other order, the following testing requirements apply to each emissions unit for which testing is required. An emissions test is an emissions rate test, a concentration test, or an opacity test.

- TR1. Required Number of Test Runs.** For emission rate or concentration limitations, an emissions test shall consist of three valid test runs to determine the total air pollutant emission rate or concentration through the test section of the stack or duct. A valid test run is a test run that meets all requirements of the applicable test method. An emissions test shall also consist of three distinct determinations of any applicable process parameters corresponding to the three distinct test run time periods during which the emission rate or concentration was measured when such data are needed in conjunction with emissions data to compare the emissions test results with the applicable emission limiting standards. Such data shall be obtained pursuant to condition **TR5**. [Subsection 62-297.310(6), F.A.C.]. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, results of the two valid runs shall be accepted, provided that the arithmetic mean of the results of the two valid runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(2), F.A.C.]
- TR2. Operating Conditions during Emissions Testing.** Testing of emissions shall be conducted with the emissions unit operating at the testing capacity as defined below. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted.
- a. Combustion Turbines. (Reserved)
 - b. All Other Sources. Testing capacity is defined as at least 90 percent of the maximum operation rate specified by the permit.
- [Rule 62-297.310(3), F.A.C.]
- TR3. Calculation of Emission Rate or Concentration.** The emission rate or concentration used for comparison with the relevant standard shall be the arithmetic average of the emission rate or concentration determined by each of the three valid test runs unless otherwise specified in an applicable rule or test method. Data collected during periods of soot blowing shall not be excluded from any calculation of emission rate or concentration. [Rule 62-297.310(4), F.A.C.]
- TR4. Required Sampling Times and Observation Periods.** Unless otherwise specified in an applicable test method, rule, permit, or other order, the owner or operator shall conduct emissions tests in accordance with the following procedures:
- a. *Emission Rate or Concentration Tests.* The required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes, except that for operations that are typically completed within less than the minimum required sampling time, the duration of each test run shall include each occurrence of the operation during the minimum required sampling time. The test period shall include the period of typical operation during which the highest representative emissions are expected to occur.
 - b. *Opacity Tests.* When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a visible emissions test shall be 60 minutes for emissions units that are subject to a multiple-valued opacity standard, and 30 minutes for all other emissions units, except that for batch, cyclical processes, or other operations that are typically completed within less than the minimum observation period, the period of observation shall include each occurrence of the operation during the minimum observation period. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
- [Rule 62-297.310(5), F.A.C.]
- TR5. Determination of Process Parameters.**
- a. *Required Process Equipment.* The owner or operator of an emissions unit for which emissions tests are required shall install, operate, and maintain equipment or instruments necessary to determine process parameters, when such data are needed in conjunction with emissions data to compare emissions test results with applicable emission limiting standards.

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- b. *Accuracy of Process Measurement Equipment.* Equipment or instruments used to directly or indirectly determine process parameters shall be calibrated and adjusted so as to determine the value of the process parameter to within 10 percent of its true value.

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

TR6. Required Emissions Testing Facilities.

- a. The owner or operator of an emissions unit, for which an emissions test other than a visible emissions test is required, shall provide emissions testing facilities that meet the requirements of 40 CFR 60.8(e), adopted and incorporated in Rule 62-204.800, F.A.C.
- b. *Permanent Emissions Testing Facilities.* The owner or operator of an emissions unit, for which an emissions test other than a visible emissions test is required on at least an annual basis, shall install and maintain permanent emissions testing facilities.
- c. *Temporary Emissions Testing Facilities.* The owner or operator of an emissions unit that is not required to conduct an emissions test on at least an annual basis may use permanent or temporary emissions testing facilities. If the owner or operator chooses to use temporary emissions testing 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.

[Rule 62-297.310(7), F.A.C.]

TR7. Frequency of Emissions Tests. The following provisions apply only to those emissions units that are subject to an emissions-limiting standard for which emissions testing is required.

a. *Annual Emissions Tests Required.*

- (1) Where used in Rules 62-210.310, 62-297.310, or Chapter 62-296, F.A.C., to refer to frequency of required emissions tests, the terms “annual”, “annually”, and “annually thereafter” shall mean no less frequently than once every calendar year (January 1 – December 31).
- (2) Unless exempted by paragraph a.(5), below [subparagraph 62-297.310(8)(a)5., F.A.C.], the owner or operator shall have an emissions unit tested annually for each of the following pollutants that has an emissions-limiting standard for which emissions testing is required:
 - (a) Each hazardous air pollutant regulated by 40 CFR Part 61, adopted and incorporated by reference at Rule 62-204.800, F.A.C.; and
 - (b) Any other regulated air pollutant, as defined at Rule 62-210.200, F.A.C., or a pollutant designated as a surrogate to a regulated air pollutant by an applicable rule or order, if allowable emissions equal or exceed 100 tons per year.
- (3) Unless exempted by paragraph a.(5), below [subparagraph 62-297.310(8)(a)5., F.A.C.], the owner or operator shall have an emissions unit tested annually for visible emissions, if there is an applicable standard other than the general opacity standard of subparagraph 62-296.320(4)(b)1., F.A.C.
- (4) Unless exempted by paragraph a.(5), below [subparagraph 62-297.310(8)(a)5., F.A.C.], the owner or operator shall have an emissions unit tested annually if a rule, permit or other order issued after March 9, 2015, requires an initial emissions test but is silent as to the frequency of additional testing. A rule, permit, or other order that states that no further testing is required after an initial test, or which expressly lists or describes the tests that shall be conducted annually, is not considered silent as to the frequency of additional testing. Annual testing is not required where a permit or other order issued prior to March 9, 2015, is silent as to the frequency of additional testing.
- (5) Exemptions from paragraphs a.(2), (3) and (4), above [subparagraphs 62-297.310(8)(a)2., 3., and 4., F.A.C.].
 - (a) An annual emissions test shall not be required for any pollutant for which a rule, permit, or other order requires emissions testing at some other specific frequency. If multiple applicable rules, permits, or other orders, other than paragraphs a.(2), (3) and (4), above [subparagraphs 62-297.310(8)(a)2., 3., and 4., F.A.C.], require different testing frequencies, testing must comply with the frequency requirements of each such rule, permit, or order.
 - (b) An annual emissions test shall not be required for any pollutant for which a rule, permit, or other order requires that the pollutant emissions be measured by a continuous emission monitoring system and, either that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 60, adopted and incorporated in Rule 62-204.800, F.A.C., or that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 75, adopted and incorporated in Rule 62-204.800, F.A.C.

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- (c) An annual emissions test shall not be required for visible emissions for which a rule, permit, or other order requires that emissions be measured by a continuous opacity monitoring system, and that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 60, adopted and incorporated in Rule 62-204.800, F.A.C., and the manufacturer's recommended quality assurance and quality control measures.
 - (d) An annual emissions test shall not be required for any emissions unit that operated for 400 hours or less (including during startup and shutdown) during the calendar year. If an emission unit operates for more than 400 hours during the calendar year, an emissions test shall be completed no later than 60 days after the emissions unit's annual operation exceeds 400 hours, or by the end of the calendar year, whichever is later.
 - (e) An annual emissions test shall not be required for any emissions unit with emissions generated solely from the combustion of fuel, provided that the emissions unit does not burn any liquid fuel or solid fuel or fuel blend for more than 400 hours combined, other than during startup, during the calendar year. If an emissions unit's liquid fuel or solid fuel or fuel blend burning exceeds 400 hours combined during the calendar year, other than during startup, an emissions test shall be completed no later than 60 days after the emissions unit's liquid fuel or solid fuel or fuel blend burning exceeds 400 hours combined, or by the end of the calendar year, whichever is later.
 - (f) An annual emissions test shall not be required for each fuel-specific emissions limit, provided the fuel or fuel blend subject to a fuel-specific limit was not burned for more than 400 hours, other than during startup, during the calendar year. If an emissions unit burns a fuel or fuel blend subject to a fuel-specific emission limit for more than 400 hours, other than during startup, during the calendar year, an emissions test for that fuel or fuel blend shall be completed no later than 60 days after the unit's burning of that fuel or fuel blend exceeds 400 hours, or by the end of the calendar year, whichever is later.
 - (g) An emissions unit shall not be required to start up for the sole purpose of conducting an emissions test to meet the frequency requirements of this condition **TR7**. [Subsection 62-297.310(8), F.A.C.]. In such a case, an emissions test shall be completed no later than 60 days after the emissions unit next starts up.
 - (h) An emissions unit permitted to burn multiple fuels or fuel blends shall not be required to switch fuels for the sole purpose of conducting an annual emissions test to meet the frequency requirements of this condition **TR7**. [Subsection 62-297.310(8), F.A.C.]. In such a case, an emissions test shall be completed no later than 60 days after a switch is made to burn the fuel or fuel blend for which testing is required.
 - (i) An annual emissions test for visible emissions shall not be required for emissions units exempted from air permitting pursuant to paragraphs 62-210.300(3)(a) or (b), F.A.C.; emissions units determined to be insignificant pursuant to paragraph 62-213.430(6)(b), F.A.C.; or, emissions units authorized pursuant to the general permit provisions in subsection 62-210.300(4), F.A.C., unless the general permit specifically requires such testing.
- b. *Emissions Tests Prior to Obtaining an Air Operation Permit.*
- (1) Unless exempted by paragraph b.(3), below [subparagraph 62-297.310(8)(b)3., F.A.C.], prior to obtaining an initial or renewal air operation permit for any emissions unit that is subject to any emission-limiting standard, the owner or operator shall have an emissions test conducted for each such standard to assist in providing reasonable assurance, per Rule 62-4.070, F.A.C., that the emission-limiting standard can be met and shall submit the test report as specified in subsection 62-297.310(10), F.A.C. For an emissions unit at a Title V source, such prior emissions testing is not required provided that an emissions testing compliance plan is included in the Title V permit.
 - (2) For the purpose of renewal of an air operation permit, the owner or operator may satisfy the requirements of paragraph b.(1), above [subparagraph 62-297.310(8)(b)1., F.A.C.], for any emissions unit by submitting the most recent emissions test, as specified in condition **TR9**. [Subsection 62-297.310(10), F.A.C.], provided such test occurred within the term of the current operation permit.
 - (3) Exemptions from paragraph b.(1), above [subparagraph 62-297.310(8)(b)1., F.A.C.].
 - (a) An emissions test shall not be required for any pollutant for which a rule, permit, or other order requires that the emissions be measured by a continuous emission monitoring system and, either that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 60, adopted and incorporated in Rule 62-204.800, F.A.C., or that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 75, adopted and incorporated in Rule 62-204.800, F.A.C.

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- (b) An emissions test shall not be required for visible emissions for which a rule, permit, or other order requires that emissions be measured by a continuous opacity monitoring system, and that system meets the performance specifications and quality assurance and quality control measures of 40 CFR part 60, adopted and incorporated in Rule 62-204.800, F.A.C., and the manufacturer's recommended quality assurance and quality control measures.
 - (c) For the purpose of renewal of an air operation permit, an emissions test shall not be required for any emissions unit that, in the previous five-year period of permitted operation, operated for 400 hours or less (including during startup and shutdown) during each calendar year included in the five-year period of permitted operation. The first time an emissions unit subsequently exceeds 400 hours of operation during a calendar year, emissions must be tested no later than 60 days after 400 hours of operation is exceeded in that calendar year, or by the end of that calendar year, whichever is later.
 - (d) For the purpose of renewal of an air operation permit, an emissions test shall not be required for any emissions unit with emissions generated solely from the combustion of fuel provided that, in the previous five-year period of permitted operation, the emissions unit did not burn any liquid fuel or solid fuel or fuel blend for more than 400 hours combined, other than during startup, during each calendar year included in the five-year period of permitted operation. The first time an emissions unit subsequently burns any liquid fuel or solid fuel or fuel blend for more than 400 hours combined during a calendar year, emissions must be tested no later than 60 days after the emissions unit's combined burning of any liquid fuel or solid fuel or fuel blend exceeds 400 hours in that calendar year, or by the end of that calendar year, whichever is later.
 - (e) An emissions test shall not be required for each fuel-specific emissions limit prior to the renewal of an air operation permit for an emissions unit provided that, in the previous five-year period of permitted operation, the fuel or fuel blend subject to a fuel-specific limit was not burned for more than 400 hours, other than during startup, during each calendar year included in the five-year period of permitted operation. The first time an emissions unit subsequently burns a fuel or fuel blend subject to a fuel-specific emission limit for more than 400 hours, other than during startup, during any calendar year, an emissions test for that fuel or fuel blend must be completed no later than 60 days after the emissions unit's burning of that fuel or fuel blend exceeds 400 hours in that calendar year, or by the end of that calendar year, whichever is later.
 - (f) An emissions unit shall not be required to start up for the sole purpose of conducting an emissions test to meet the frequency requirements of this condition **TR7**. [Subsection 62-297.310(8), F.A.C.]. In such a case, an emissions test shall be completed no later than 60 days after the emissions unit starts up.
 - (g) An emissions unit permitted to burn multiple fuels or fuel blends shall not be required to switch fuels for the sole purpose of conducting the emissions test to meet the frequency requirements of this condition **TR7**. [Subsection 62-297.310(8), F.A.C.]. In such a case, an emissions test shall be completed no later than 60 days after a switch is made to burn the fuel or fuel blend for which testing is required.
 - (h) An emissions test for visible emissions shall not be required for emissions units exempted from air permitting pursuant to paragraphs 62-210.300(3)(a) or (b), F.A.C.; emissions units determined to be insignificant pursuant to paragraph 62-213.430(6)(b), F.A.C.; or emissions units authorized pursuant to the general permit provisions in subsection 62-210.300(4), F.A.C., unless the general permit specifically requires such testing.
- c. *Special Compliance Tests*. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit, unless the Department obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the Department in accordance with the provisions of condition **TR9**. [Subsection 62-297.310(10), F.A.C.]. [Rule 62-297.310(8), F.A.C.]

TR8. Scheduling and Notification. At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the air compliance program identified by permit, unless shorter notice is agreed to by the appropriate air compliance program. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled

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emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. [Rule 62-297.310(9), F.A.C.]

TR9. Test Reports.

- a. The owner or owner's authorized agent of an emissions unit for which an emissions test is required shall submit a written test report to the compliance authority specified by permit, on the results of each such test as soon as practicable but no later than 45 days after the last run of each test is completed. Test reports may be submitted electronically.
- b. If the owner or owner's authorized agent of an emissions unit for which an emissions test is required submits the results of each such test electronically using the EPA Electronic Reporting Tool (ERT) (<http://www.epa.gov/ttnchie1/ert/>), the written report specified in paragraph a., above [paragraph 62-297.310(10)(a), F.A.C.], need not be submitted, provided the conditions of paragraphs (1) – (3), below [subparagraphs 62-297.310(10)(b)1. through 3., F.A.C.], are met:
 - (1) The owner or owner's authorized agent shall submit the test information using the ERT as soon as practicable but no later than 45 days after the last run of each test is completed;
 - (2) The test information shall provide, as a minimum, the information specified in paragraphs c.(1) – (24), below [subparagraphs 62-297.310(10)(c)1. through 24., F.A.C.]; and
 - (3) The compliance authority specified by permit must receive written notification, no later than 45 days after the last run of each test is completed, of the date that the test data was submitted using the ERT.
- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:
 - (1) The type, location, and identification number of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner and, if other than the owner, operator of the emissions unit.
 - (4) The type and amount of fuels and materials typically used and processed, and the actual types and amounts of fuels used and material processed during each test run.
 - (5) If necessary in order to compare the emissions test results with an applicable emission limiting standard, the means, raw data, and computations used to determine the amount of fuels used and materials processed.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their typical operating parameters, and their actual operating parameters during each test run.
 - (7) A diagram of the sampling location, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time, and duration of each sampling run.
 - (9) The test procedures, including any authorized alternative procedures, used.
 - (10) The number of points sampled, and the configuration and location of the sampling plane.
 - (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack or duct, temperatures, average meter temperatures, and sample time per point.
 - (12) The type, manufacturer, and configuration of the sampling equipment used.
 - (13) Data related to the required calibration of the test equipment.
 - (14) Data on the identification, processing, and weights of all filters used.
 - (15) Data on the types and amounts of any chemical solutions used.
 - (16) For each sampling run, data on the amount of pollutant collected from each sampling probe.
 - (17) For each sampling run, data on the amount of pollutant collected from the filters.
 - (18) For each sampling run, data on the amount of pollutant collected from the impingers.
 - (19) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 - (20) All measured and calculated data required to be determined by each applicable test procedure for each run.
 - (21) The detailed calculations for one run that relate the collected data to the calculated emission rate or concentration, as applicable.
 - (22) The applicable emission standard, and the resulting maximum allowable emission rate or concentration for the emissions unit, as applicable, plus the test result in the same form and unit of measure.
 - (23) When an emissions test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or owner's authorized agent shall

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certify that all data required and provided to the person conducting the test are true and correct to his or her knowledge.

- (24) For non-Title V sources, a certification by the owner or owner's authorized agent that, to his or her knowledge, all data submitted are true and correct.
- (25) Any report submitted for a Title V source shall contain certification by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Rule 62-297.310(10), F.A.C.]

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Operation

- TV1. General Prohibition.** 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.)]
- TV2. Validity.** 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. [Rule 62-4.160(2), F.A.C.]
- TV3. Proper Operation and Maintenance.** The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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. [Rule 62-4.160(6), F.A.C.]
- TV4. Not Federally Enforceable. Health, Safety and Welfare.** 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. [Rule 62-4.050(3), F.A.C.]
- TV5. Continued Operation.** An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program, applicable requirements of the CAIR Program, and applicable requirements of the Hg Budget Trading Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]
- TV6. Changes Without Permit Revision.** Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:
- a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
 - b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;
 - (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
 - (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
 - c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.
- [Rule 62-213.410, F.A.C.]
- TV7. Circumvention.** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Compliance

- TV8. Compliance with Chapter 403, F.S., and Department Rules.** Except as provided at Rule 62-213.460, Permit Shield, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]
- TV9. Compliance with Federal, State and Local Rules.** Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

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- TV10. Binding and enforceable.** 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, F.S. 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. [Rule 62-4.160(1), F.A.C.]
- TV11. Timely information.** 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 the 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. [Rule 62-4.160(15), F.A.C.]
- TV12. Halting or reduction of source activity.** It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]
- TV13. Final permit action.** Any Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]
- TV14. Sudden and unforeseeable events beyond the control of the source.** A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]
- TV15. Permit Shield.** Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program, the CAIR Program. [Rule 62-213.460, F.A.C.]
- TV16. Compliance With Federal Rules.** A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

Permit Procedures

- TV17. Permit Revision Procedures.** The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the Department shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).
- TV18. Permit Renewal.** The permittee shall renew its permit as required by Rules 62-4.090, 62-213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]
- TV19. Insignificant Emissions Units or Pollutant-Emitting Activities.** The permittee shall identify and evaluate insignificant emissions units and activities as set forth in Rule 62-213.430(6), F.A.C.

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TV20. Savings Clause. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect. [Rule 62-213.440(1)(d)1., F.A.C.]

TV21. Suspension and Revocation.

- a. Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.
- b. Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.
- c. A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or his agent:
 - (1) Submitted false or inaccurate information in his application or operational reports.
 - (2) Has violated law, Department orders, rules or permit conditions.
 - (3) Has failed to submit operational reports or other information required by Department rules.
 - (4) Has refused lawful inspection under Section 403.091, F.S.
- d. No revocation shall become effective except after notice is served by personal services, certified mail, or newspaper notice pursuant to Section 120.60(7), F.S., upon the person or persons named therein and a hearing held if requested within the time specified in the notice. The notice shall specify the provision of the law, or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.

[Rule 62-4.100, F.A.C.]

TV22. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules. [Rule 62-4.110, F.A.C.]

TV23. Emissions Unit Reclassification.

- a. Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.
- b. If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

TV24. Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon Department approval in accordance with Rule 62-4.120, 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. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

Rights, Title, Liability, and Agreements

TV25. Rights. As provided in Subsections 403.987(6) and 403.722(5), F.S., 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 this permit. [Rule 62-4.160(3), F.A.C.]

TV26. Title. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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. [Rule 62-4.160(4), (F.A.C.)]

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TV27. Liability. 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 to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department. [Rule 62-4.160(5), F.A.C.]

TV28. Agreements.

- a. 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (1) Have access to and copy any records that must be kept under conditions of the permit;
 - (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - (3) 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.
- b. 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 prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- c. 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.

[Rules 62-4.160(7), (9), and (10), F.A.C.]

Recordkeeping and Emissions Computation

TV29. Permit. The permittee shall keep this permit or a copy thereof at the work site of the permitted activity. [Rule 62-4.160(12), F.A.C.]

TV30. Recordkeeping.

- 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 five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - (1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;
 - (2) The person responsible for performing the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The person and company that performed the analyses;
 - (5) The analytical techniques or methods used;
 - (6) The results of such analyses.

[Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

TV31. Emissions Computation. Pursuant to Rule 62-210.370, F.A.C., the following required methodologies are to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with Rule 62-210.370, F.A.C. Rule 62-210.370, F.A.C., is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

For any of the purposes specified above, the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

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- a. *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. *Continuous Emissions Monitoring System (CEMS).*
- (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
 - (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - (a) A calibrated flowmeter that records data on a continuous basis, if available; or
 - (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. *Mass Balance Calculations.*
- (1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,
 - (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. *Emission Factors.*
- (1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An

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owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

- (a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - (c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- (2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
 - f. *Accounting for Emissions During Periods of Startup and Shutdown.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
 - g. *Fugitive Emissions.* In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
 - h. *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(1) & (2), F.A.C.]

Responsible Official

TV32. Designation and Update. The permittee shall designate and update a responsible official as required by Rule 62-213.202, F.A.C.

Prohibitions and Restrictions

TV33. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

TV34. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Chapter 62-281, F.A.C.

TV35. Open Burning Prohibited. Unless otherwise authorized by Rule 62-296.320(3) or Chapter 62-256, F.A.C., open burning is prohibited.

ATTACHMENTS
(INCLUDED FOR CONVENIENCE)

The following attachments are included for convenient reference:

Table H, Permit History.

Statement of Basis

Table 1, Summary of Air Pollutant Standards and Terms

Table 2, Compliance Requirements.

TABLE H
PERMIT HISTORY

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type
-001	Flexographic Printing Facility	0950055-026-AV	Xx/xx/2018	Xx/xx/2023	Revise and renew AV
-001	Flexographic Printing Facility	0950055-025-AC	12/19/2017	12/31//2018	Change emission limits
-001	Flexographic Printing Facility	0950055-024-AC	01/06/2016	12/31/2017	Add new press
-001	Flexographic Printing Facility	0950055-023-AV	04/15/2013	04/15/2018	Initial Title V
-001	Flexographic Printing Facility	0950055-022	11/09/2012	08/01/2013	Extend -020-AC
-001	Flexographic Printing Facility	0950055-021	12/09/2011	02/19/2012	Extend -010-AC
-001	Flexographic Printing Facility	0950055-020-AC	02/20/2012	01/31/2013	Facility-wide AC
-001	Flexographic Printing Facility	0950055-019	06/28/2011	11/21/2011	Extend -010-AC
-001	Flexographic Printing Facility	0950055-018	03/25/2011	03/31/2011	Ownership transfer
-001	Flexographic Printing Facility	0950055-017	06/25/2010	03/31/2011	Extend -010-AC
-001	Flexographic Printing Facility	0950055-016	11/09/2010	03/31/2011	AC Mod - Press replacement
-001	Flexographic Printing Facility	0950055-015-AO	Withdrawn		AO renewal
-001	Flexographic Printing Facility	0950055-014	10/19/2008	08/30/2010	Extend -010-AC
-001	Flexographic Printing Facility	0950055-013	09/26/2008	11/30/2009	Extend -010-AC
-001	Flexographic Printing Facility	0950055-012	05/16/2008	11/30/2008	Extend -010-AC
-001	Flexographic Printing Facility	0950055-011	10/30/2007	05/31/2008	Extend -010-AC
-001	Flexographic Printing Facility	0950055-010-AC	11/21/2006	11/30/2007	Add fifth press
-001	Flexographic Printing Facility	0950055-009-AO	06/09/2005	06/30/2010	Operation permit revision
-001	Flexographic Printing Facility	0950055-008	03/23/2005	09/30/2005	Ownership transfer
-001	Flexographic Printing Facility	0950055-007	Denied		Ownership transfer
-001	Flexographic Printing Facility	0950055-006-AC	09/16/2004	09/30/2005	Add fourth press
-001	Flexographic Printing Facility	0950055-005	03/12/2004	01/30/2005	AC Mod - Extend test date
-001	Flexographic Printing Facility	0950055-004-AC	12/15/2003	10/30/2004	Increase production, add control
-001	Flexographic Printing Facility	0950055-003	01/17/2002	01/01/2005	AC Mod - Press replacement
-001	Flexographic Printing Facility	0950055-002-AO	01/10/2000	01/01/2005	Operation permit
-001	Flexographic Printing Facility	0950055-001-AC	02/19/1997	02/19/2002	Add third and fourth presses
-001, -002	Flexographic Printing Facility	AO-48234019	05/09/1994	04/30/1999	Operation permit
-002	Flexographic Printing Facility	AC-48215384	12/15/1992		Add second press
-001	Flexographic Printing Facility	AO-48214614	01/29/1993	12/30/1997	Operation permit
-001	Flexographic Printing Facility	AC-48200201	12/03/1991		Construction permit

STATEMENT OF BASIS

Title V Air Operation Permit Revision and Renewal
Permit No. 0950052-026-AV

APPLICANT

The applicant for this project is Inteplast Engineered Films. The applicant's responsible official and mailing address are: Richard Stephan, Operations Manager, Inteplast Engineered Films, 7549 Brokerage Drive, Orlando, Florida 32809.

FACILITY DESCRIPTION

Inteplast Engineered Films is located in Orange County at 7549 Brokerage Drive, Orlando, Florida. This flexographic printing facility includes three flexographic presses vented to a regenerative thermal oxidizer (RTO). Note that one press (Press No. 6) is currently not operational. The applicant did not perform a compliance test on this press before renewal, and the revised/renewed Title V permit requires a compliance test for capture efficiency and destruction efficiency before the applicant may resume using this press. Primary pollutants are Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). Also included in this facility are miscellaneous insignificant emissions units and activities, including the ink storage room, ink mixing station, and plastic bag manufacturing operation.

EU	Emission Unit Description
001	<p><u>Flexographic Printing Facility</u></p> <p>This emission unit consists of the following equipment.</p> <p>3. Three Flexographic Presses, each with drying ovens fired with natural gas: Press No. 3: Windmoeller & Hoelscher, Model Novaflex flexographic press Press No. 6: PCMC Model Infinity flexographic press (not operational). This press must pass a compliance test before the facility may resume operation of Press No. 6. Press No. 7: Amut Bielloni Converting, Model Telia FSC 5010 Maxi flexographic press</p> <p>4. One regenerative thermal oxidizer (RTO) manufactured by CMM Group, Model number RTO-15000-M-95. The RTO's minimum combustion chamber operating temperature is 1500°F. The RTO fuel is natural gas, and the burner is rated at 1 MMBTU/hr. The RTO rated loading is 15,000 SCFM with a VOC loading of 4.2 MMBTU/hr.</p> <p>The exhaust emissions of all presses are manifolded together and the exhaust air flow is vented to the RTO. The RTO exhaust stack is 20 feet tall, 2.67 feet diameter, and the exhaust gas temperature is approximately 250°F. The presses are fully enclosed in a room that may be used as a temporary total enclosure if it meets the requirements of EPA Method 204, Criteria for and Verification of a Permanent or Temporary Total Enclosure.</p>

APPLICABLE REGULATIONS

This facility is a major source of VOC, with a VOC emission limit of less than 225.0 TPY. The facility had previously been subject to a 175.0 TPY VOC limit. Construction Permit No. 0950052-025-AC authorized an increase in the VOC emission limit from 175.0 TPY to 225.0 TPY.

Based on the Initial Title V Air Operation Permit application received November 15, 2012, this facility is **not a major** source of HAP. Construction Permit No. 0950052-025-AC authorized a decrease in the individual HAP (from 9 TPY to 5.0 TPY) and combined HAP (from 20 TPY to 10.0 TPY). This facility is now subject to emission limits of 5.0 TPY for individual HAP and 10.0 TPY for total HAPs.

This facility is subject to Rule 62-296.500, F.A.C., Reasonably Available Control Technology (RACT) - Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities, and Rule 62-296.515, F.A.C, Graphic Arts Systems.

STATEMENT OF BASIS

This facility is subject to 40 CFR Part 63 Subpart A, General Provisions, and 40 CFR Part 63 Subpart KK, National Emission Standard for the Printing and Publishing Industry. The facility is an area (synthetic minor) source of HAP and meets the requirements of 40 CFR Part 63 Subpart KK §63.820(a)(2), so it is only subject to the recordkeeping requirements of §63.829(d) and the reporting requirements of §63.830(b)(1). The reporting requirements of §63.830(b)(1) are met by Construction Permit No. 0950052-020-AC.

Regulation	EU Nos.
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A- General Provisions	001
40 CFR 63, Subpart KK - National Emission Standard for the Printing and Publishing Industry	001
40 CFR 64, Compliance Assurance Monitoring (CAM)	001
<i>State Rule Citations</i>	
Rule 62-4.070, F.A.C., Standards for Issuing or Denying Permits; Issuance; Denial	001
Rule 62-4.090, F.A.C., Renewals	001
Rule 62-204.800, F.A.C., Federal Regulations Adopted by Reference	001
Rule 62-210.200, F.A.C., Definitions	001
Rule 62-210.370, F.A.C., Emissions Computation and Reporting	001
Rule 62-213.440, F.A.C., Permit Content	001
Rule 62-213.900, F.A.C., Forms and Instructions	001
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	001
Rule 62-296.500, F.A.C., Reasonable Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities	001
Rule 62-296.515, F.A.C., Graphic Arts Systems	001
Rule 62-297.310, F.A.C., General Emissions Test Requirements	001
Rule 62-297.450, F.A.C., EPA VOC Capture Efficiency Test Procedures	001
<i>Orange County Ordinance Citations</i>	
Orange County Code of Ordinances, Chapter 15, Article III, Air Quality Control	001

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities. See Appendix I.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew and revise the Title V permit for the above-referenced facility. The revisions include the modifications authorized by Construction Permit No. 0950052-024-AC (add Press No. 7) and Construction Permit No. 0950052-025-AC (change emissions limits).

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued April 15, 2013

Application for Title V Air Operation Permit Revision and Renewal received August 30, 2017

Application for Concurrent Title V Air Construction Permit (0950052-025-AC) received August 30, 2017

Mail DRAFT permit package with Intent to Issue Air Permit on November 21, 2017

STATEMENT OF BASIS

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 2759

North American Industry Classification System (NAICS): 323111 (not included in application; assumption based upon SIC Code)

HAP: The facility is identified as a synthetic minor source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

1. 40 CFR 63, Subpart A – General Provisions
2. 40 CFR 63, Subpart KK, National Emission Standard for the Printing and Publishing Industry.

CAM: Compliance Assurance Monitoring (CAM) applies to Emission Unit 001, which uses a regenerative thermal oxidizer for control of VOC and HAP.

PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document.

The facility changed name, with no change in ownership. EPD was notified in August 2016. The new name is Inteplast Engineered Films. All references to Niaflex were changed as such.

1. This project incorporates updates to the FDEP template for Title V operation permits, and updates the Facility Description in Subsection A with increased detail. This includes the updated Appendices.
2. The Summary of Emissions Units has been revised to include the changes authorized by Permit No. 0950052-024-AC.

Facility ID Number 0950052	
EU	Emission Unit Description
001	<p>Flexographic Printing Facility</p> <p>This flexographic printing facility <u>emission unit</u> consists of the following equipment:</p> <ol style="list-style-type: none">1. Five Three Flexographic Presses: Press Number 1: Omat Tortona Series 6AZ, Model 100/110 flexographic press Press Number 2: Windmoeller & Hoelscher, Model Starflex flexographic press Press Number 3: Windmoeller & Hoelscher, Model Novaflex flexographic press Press Number 5: Uteco flexographic press Press Number 6: PCMC Model Infinity flexographic press (not operational). This press must pass a compliance test before the facility may resume operation of Press No. 6. Press No. 7: Amut Bielloni Converting, Model Telia FSC 5010 Maxi flexographic press2. One regenerative thermal oxidizer (RTO) manufactured by CMM Group, Model number RTO-15000-M-95. The RTO's minimum combustion chamber operating temperature is 1500°F. The RTO fuel is natural gas. <u>The RTO fuel is natural gas, and the burner is rated at 1 MMBTU/hr. The RTO rated loading is 15,000 SCFM with a VOC loading of 4.2 MMBTU/hr.</u>

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	The exhaust emissions of all five presses are manifolded together and the exhaust air flow of approximately 14,000 SCFM is vented to the RTO. The RTO exhaust stack is 20 feet tall, 2.67 feet diameter, and the exhaust gas temperature is approximately 250°F. The presses are fully enclosed in a room that may be used as a temporary total enclosure if it meets the requirements of EPA Method 204, Criteria for and Verification of a Permanent or Temporary Total Enclosure.
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3. This revised operation permit removes two erroneous regulatory citations from the Applicable Regulations Table. The rules at 62-296.406 and 62-296.513, F.A.C., are not relevant to this facility.
4. In the Facility-Wide Conditions, the revised permit follows the FDEP template, including an updated combined Electronic Annual Operating Report and Title V Annual Emissions Fees condition, reference to Appendix RR instead of a condition regarding test notification, and addition of a semi-annual monitoring reports condition (moved from Appendix RR to facility-wide section).
5. The revised operation permit uses the updated FDEP template, which specifies a table with only the EU description, rather than repeating the full EU description for Section 1, Subsection A, followed by a detailed description of the emissions unit and associated control device.
6. Construction Permit No. 0950052-25-AC removed condition A.2. of Permit No. 0950052-023-AV.
~~A.2. Capacities:~~
 - a. ~~The maximum ink solvent usage in all presses combined shall not exceed 750 tons in any consecutive 12 month period.~~
 - b. ~~The maximum total ink plus ink solvent usage, in all presses combined, shall not exceed 963 tons in any consecutive 12 month period.~~~~[Rule 62-210.200, (PTE), F.A.C., Construction permit 0950052-020-AC]~~

This condition is replaced with a permitting note as follows.

[Permitting Note: The usage limits for ink and ink solvent in Permits Nos. 0950052-020-AC, 0950052-023-AV, and 0950052-024-AC, were removed by Permit No. 0950052-025-AC. See Technical Evaluation and Preliminary Determination for Permit No. 0950052-025-AC.]

This causes all subsequent conditions to be renumbered. For example, condition A.3. of Permit No. 0950052-023-AV is now A.2. in 0950052-026-AV. See the Technical Evaluation and Preliminary Determination for Permit No. 0950052-025-AC for an explanation of this removal.

7. EPD added citations to Permit No. 0950052-024-AC, the construction permit that authorized addition of Press No. 7, for several conditions.
8. The VOC and HAP emissions standards, formerly condition A.7. in Permit No. 0950052-023-AV, are now condition A.6. and were modified by Permit No. 0950052-025-AC.

~~A.7.~~ A.6. VOC and HAP Emissions Standards:

- a. VOC emissions shall not exceed ~~175~~ 225 tons in any consecutive 12-month period.
 - b. Individual HAP emissions shall not exceed ~~9.0~~ 5.0 tons in any consecutive 12-month period
 - c. Combined HAP emissions shall not exceed ~~20.0~~ 10.0 tons in any consecutive 12-month period
- ~~[Rule 62-210.200(PTE), F.A.C.; 40 CFR Part 63 Subpart KK §63.820(a)(2); Construction permit 0950052-025-AC]~~ Permit No. 0950052-025-AC]

See the Technical Evaluation and Preliminary Determination for Permit No. 0950052-025-AC for an explanation of this change in permit limits.

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9. Several of the F.A.C. citations have been amended, such as Rule 62-297.310, F.A.C., since the issuance of Permit No. 0950052-023-AV, and the citations are corrected on the conditions in Permit No. 0950052-026-AV.

10. EPD added an existing requirement (from Appendix RR) to the specific conditions, within the Compliance Tests for Operation Permit Renewal condition, as follows:

~~A.9.~~ **A.8.** Compliance Tests for Operation Permit Renewal. Demonstration of the capture efficiency and destruction efficiency shall be conducted prior to the operation permit expiration date. The permittee shall notify the EPD in writing of the test date, and provide the protocol that will be used for the capture efficiency and destruction efficiency demonstration, at least 30 days prior to compliance testing. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test. Tests shall be conducted in accordance with the applicable requirements specified in Appendix TR (Facility-Wide Testing Requirements) of this permit. [Rules 62-297.310(8)(b) & 62-297.450, F.A.C., and Permit Nos. 0950052-020-AC & 0950052-024-AC]

11. EPD added clarifying language (taken from the cited F.A.C. rule) as follows:

~~A.10.~~ **A.9.** Destruction Efficiency Testing. The test method for volatile organic compounds shall be EPA Method 25, as described at 40 C.F.R. Part 60, Appendix A-7, adopted and incorporated by reference at Rule 62-204.800, F.A.C., or Attachment 3 of EPA 450/ 2-78-041, Alternate Test Method for Direct Measurement of Total Gaseous Organic Compounds Using a Flame Ionization Analyzer, adopted with equipment specifications per Industrial Ventilation Manual, and incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.515(3)(b)1., F.A.C., and Permit Nos. 0950052-020-AC & 0950052-24-AC]

12. The regulations in Rule 62-297, F.A.C., have been revised. The condition requiring capture efficiency testing has been edited as follows:

~~A.11.~~ **A.10.** Capture Efficiency Testing. The test method for volatile organic compounds shall be EPA VOC Capture Efficiency Test Procedures listed in Rule 62-297. ~~440(7)~~ **450**, F.A.C. Capture efficiency testing shall be performed according to the Alternate Sampling Procedure in Appendix ASP. [Rules 62-296.515(3)(b) ~~1.2~~ & 62-297.450, F.A.C.; Alternate Sampling Procedure, FDEP File Number 11-F-AP; and Permit Nos. 0950052-020-AC & 0950052-024-AC]

This revision also corrects a reference to Rule 62-296.515, F.A.C.

13. EPD used updated wording as suggested in the FDEP template for the Required Emissions Testing Facilities condition (formerly Stack Sampling Facilities) condition.

14. The recordkeeping condition is revised to remove the reference to former condition **A.2**. The remainder of the condition remains unchanged. The facility is still required to calculate the monthly and consecutive 12-month totals of ink and ink solvent usage, as they are necessary for calculating the emissions.

15. EPD added two additional indicators to the CAM Plan in Appendix CAM and modified the wording for the temperature indicator range. During the most recent compliance testing, the RTO combustion chamber temperature remained above 1600°F, which is above the set point of 1425°F. EPD updated the Note in the left column, and changed the indicator range to specify that excursions occur at temperatures of less than 50°F below either the average temperature during the most recent

STATEMENT OF BASIS

compliance test or the set point, whichever is lower. The two additional indicators were suggested by EPD compliance staff to address the problems encountered during the compliance testing performed in July and August 2017. The first added indicator assures that the exhaust damper remains open such that press exhaust is fed to the RTO inlet. The second added indicator directs the permittee to measure the inlet suction such that press exhaust is being drawn into the RTO.

CONCLUSION

This project revises and renews Title V air operation Permit No. 0950052-023-AV, which was effective on April 15, 2013. This Title V air operation permit revision and renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

POLLUTANT STANDARDS AND COMPLIANCE REQUIREMENTS

Table 1. Summary of Air Pollutant Standards and Terms.

EU	Brief Description	Hrs/Yr	Pollutant Name	Standard Allowable Emissions	Equivalent Emissions		See Permit Condition(s)
					lbs/hr	TPY	
001	Flexographic Printing Facility	8760	VOC	N/A	N/A	225	A.6.a.
001	Flexographic Printing Facility	8760	Individual HAP	N/A	N/A	5.0	A.6.b.
001	Flexographic Printing Facility	8760	Combined HAPs	N/A	N/A	10.0	A.6.c.
001	Flexographic Printing Facility	8760	PM (Opacity)	20%	N/A	N/A	A.5.

Table 2. Compliance Requirements.

EU	Brief Description	Pollutant Name	Emission Control	Compliance Method	Testing Frequency	Compliance Test Duration	See Permit Conditions
001	Flexographic Printing Facility	PM, VOC, HAP	Thermal Oxidizer (RTO)	Recordkeeping, VE, Stack Test (DE and CE)	5 Years	60 Min (VE)	A.8., A.9, A.10., A.11.