



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

ELECTRONIC MAIL
ssaul@spiralkote.com

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Steve Saull, Vice President of Operations
Spiralkote Flexible Packaging, Inc.
1200 Central Florida Parkway
Orlando, FL 32837-9295

Re: **FINAL** Title V Permit No.: 0950125-008-AV
Printing Facility

Dear Mr. Saull:

Enclosed is **FINAL** Permit Number 0950125-008-AV for the operation of the Printing Facility located at 1200 Central Florida Parkway, Orlando, Orange County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/azt

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL Permit) and all copies were sent by certified mail or electronically (with Received Receipt) before the close of business on 8/1/07 to the person(s) listed:

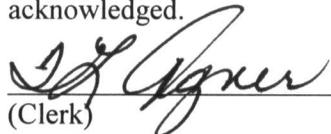
Jerome J. Guidry, P.E. (**Jerome.guidry@att.net**)
Hamp Pridgen, OCEPD (**hamp.pridgen@ocfl.net**)
Caroline Shine, FDEP

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF FINAL PERMIT (including the FINAL Permit) were sent by certified mail or electronically (with Received Receipt) on the same date to the person(s) listed:

Barbara Friday, BAR [**Barbara.Friday@dep.state.fl.us**] (for posting with Region 4, U.S. EPA)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

 8/1/07
(Clerk) (Date)

FINAL Determination

Title V Air Operation Permit
FINAL Permit No.: 0950125-008-AV
Spiralkote Flexible Packaging, Inc.
Printing Facility
Page 1 of 1

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

Spiralkote Flexible Packaging, Inc.
Printing Facility
Facility ID No.: 0950125
Orange County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: **0950125-008-AV**
Renewal of Title V Air Operation Permit No.: 0950125-007-AV

Permitting and Compliance Authority:
Orange County Environmental Protection Division
800 Mercy Drive, Suite 4
Orlando, Florida 32808

Telephone: 407/836-1400
Fax: 407/836-1499

Title V Air Operation Permit Renewal

FINAL Permit No.: 0950125-008-AV

Renewal of Title V Air Operation Permit No.: 0950125-007-AV

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2 - 3
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	4 - 6
III. Emissions Unit(s) and Conditions	
A. 006 – ImageSolv Inline Plate Making System	7
B. 010 – W & H Olympia 746 Flexographic Press (W & H I)	8 - 13
011 – W & H Olympia Stellaflex 8L Press (W & H III)	
012 – Tachys FNC-3000 Press	

Referenced Attachments:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix CAM
Appendix H-1, Permit History
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX SS-1, STACK SAMPLING FACILITIES
APPENDIX SUBPART A, GENERAL PROVISIONS
APPENDIX TV-6, TITLE V CONDITIONS
TABLE 297.310-1, CALIBRATION SCHEDULE
STATEMENT OF BASIS



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:

Spiralkote Flexible Packaging, Inc.
1200 Central Florida Parkway
Orlando, Florida 32837-9295

FINAL Permit No.: 0950125-008-AV

Facility ID No.: 0950125

SIC No(s): 27, 2759

Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew Title V Air Operation Permit, No. 0950125-007-AV. This existing facility is located at 1200 Central Florida Parkway; Orlando, Orange County; UTM Coordinates: Zone 17, 461.4 km East and 3142.0 km North; and, Latitude: 28° 24' 21" North and Longitude: 81° 23' 40" West.

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

Referenced attachments made a part of this permit:

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

Appendix CAM

APPENDIX SS-1, STACK SAMPLING FACILITIES

APPENDIX SUBPART A, GENERAL PROVISIONS

APPENDIX TV-6, TITLE V CONDITIONS

TABLE 297.310-1, CALIBRATION SCHEDULE

Effective Date: July 19, 2007
Renewal Application Due Date: September 30, 2011
Expiration Date: March 30, 2012

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB
JNB/azt

Section I. Facility Information.

Subsection A. Facility Description.

This facility is a printing facility consisting of four regulated emissions units described as follows:

ImageSolv Inline Plate Making System, which has a Concept 500 exposure unit, a Concept 501 processor, a Concept 500 dryer/finisher, and a solvent recovery still.

W & H Olympia 746 Flexographic Press (W & H I), which is a flexographic printing and coating unit with four associated dryers (a 0.4 MMBTU per hour "Between Color" dryer; a 0.4 MMBTU per hour "Tunnel" dryer; and two 0.8 MMBTU per hour dryers for coater number 1). The dryers will operate at an idling level when not being used for production. Emissions of VOCs from this press are controlled by a Megtec Magnum Model MAG-180-70-6-C catalytic recuperative oxidizer (Oxidizer B), which also services the Tachys Press. The associated catalytic oxidizer system will have a minimum 70 percent capture and transport efficiency and 95 percent destruction efficiency for volatile organic chemicals (VOCs).

W & H Olympia Stellaflex 8L Press with In-line Unit (W & H III), which consists of eight printing stations on a central impression, and one coating unit. The press is equipped with a Magnum catalytic oxidizer (Oxidizer A), which provides a minimum 95 percent reduction efficiency for VOC emissions that enter the oxidizer inlet, and a minimum VOC capture efficiency of 70 percent for an overall minimum VOC emissions removal efficiency of 66.5 percent for the system.

Tachys FNC-3000 8-color central impression printing press, which is equipped with a Megtec Magnum Model MAG-180-70-6-C catalytic recuperative oxidizer (Oxidizer B). The oxidizer provides a minimum 95 percent reduction efficiency for VOC emissions that enter the oxidizer inlet, and a minimum VOC capture efficiency of 70 percent for an overall minimum VOC removal efficiency of 66.5 percent for the system.

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

Based on the Title V Air Operation Permit Renewal application received September 29, 2006, this facility is a major source of hazardous air pollutants (HAPs).

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

<u>E.U. ID No.</u>	<u>Brief Description</u>
-006	ImageSolv Inline Plate Making System
-010	W & H Olympia 746 Flexographic Press (W & H I)
-011	W & H Olympia Stellaflex 8L Press (W & H III)
-012	Tachys FNC-3000 Press

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

Subsection C. Relevant Documents.

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

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

These documents are on file with the permitting authority:
Initial Title V Air Operation Permit issued June 15, 1998
Air Construction Permit Application received March 26, 1997
Air Construction Permit issued June 2, 1997
Air Construction Permit Application received December 29, 2000
Air Construction Permit issued April 24, 2000
Title V Air Operation Permit Revision issued November 29, 2000
Application for a Title V Air Operation Permit Renewal received September 28, 2001
Additional Information Request dated November 13, 2001
Additional Information Response received April 11, 2002
Title V Air Operation Permit issued October 14, 2002
Application for a Title V Air Operation Permit Renewal received September 29, 2006
Application for a construction permit received March 1, 2007.

Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit are for informational purposes only and are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS are a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).

[Rule 62-296.320(4)(b)1., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

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

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

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

[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:

- a. Tightly cover or close all VOC containers when they are not in use;
- b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc.;
- c. Maintain all piping, valves, fittings, etc. in good operating condition;
- d. Prevent excessive air turbulence across exposed VOC; and
- e. Immediately confine and clean up spills of VOC containing materials.

[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Chemical or water application to unpaved roads and unpaved yard areas;
- b. Paving and maintenance of roads, parking areas and yards;
- c. Landscaping or planting of vegetation; and
- d. Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

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

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

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

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

11. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

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

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

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).
[Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

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

<u>E.U. ID No.</u>	<u>Brief Description</u>
-006	ImageSolv Inline Plate Making System

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

Essential Potential to Emit (PTE) Parameters

A1. Permitted Capacity. The maximum permitted solvent usage is 180 tons per any consecutive 12-month period.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and construction permit 0950125-009-AC]

A2. Hours of Operation. This emission unit is allowed to operate continuously.

[Rule 62-210.200(PTE), F.A.C., and permit 0950125-005-AC]

Emission Limitations and Standards

A3. The maximum permitted VOC emissions shall not exceed 9 tons per any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C., and permit 0950125-005-AC]

Test Methods and Procedures

A4. Supporting documentation, such as material Safety Data Sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc., shall be kept which includes sufficient information to determine compliance. 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 log and documents shall be kept at the facility for at least five years and made available to the Department. Monthly logs shall be completed by the end of the following month.

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

Recordkeeping and Reporting Requirements

A5. In order to demonstrate compliance with conditions No. A1 and A3, the permittee shall maintain a log at the facility for a period of at least five years from the date the data is recorded. The log shall contain the following:

Monthly

a) Month; and,

b) Consecutive 12-month total of solvent solution usage and VOC emission rate.

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

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

<u>E.U. ID No.</u>	<u>Brief Description</u>
-010	W & H Olympia 746 Flexographic Press (W & H I)
-011	W & H Olympia Stellaflex 8L Press (W & H III)
-012	Tachys FNC-3000 Press

{**Permitting note:** These emissions units are regulated under: NESHAP - 40 CFR 63, Subpart A, General Provisions, Sections 1-15, as well as 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, Section 825, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and Compliance Assurance Monitoring (CAM), adopted and incorporated by reference in Rule 62-204.800, F.A.C.}

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

Essential Potential to Emit (PTE) Parameters

B1. Capacity. The maximum capacities are as follows:

- a) E.U. 010 – The maximum VOC usage shall not exceed 213 tons per any consecutive 12-month period;
- b) E.U. 011 – The maximum VOC usage shall not exceed 232 tons per any consecutive 12-month period; and,
- c) E.U. 012 – The maximum VOC usage shall not exceed 232 tons per any consecutive 12-month period.

[Rule 62-210.200, (PTE), F.A.C., and permit 0950125-005-AC]

B2. Methods of Operation. Each unit is allowed to fire propane or natural gas only.

[Rule 62-210.200, (PTE), F.A.C., and permit 0950125-005-AC]

B3. Hours of Operation. Each emission unit is allowed to operate continuously.

[Rule 62-210.200, (PTE), F.A.C., and permit 0950125-005-AC]

Emission Limitation and Standards

B4. The visible emissions for each stack are limited to less than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C. and Air Construction Permit 0950125-005-AC]

B5. The applicable VOC emission limitations are as follows:

a) E.U. 010 – VOC emissions shall not exceed 71 tons per any consecutive 12-month period, including cleanup solvent less solvent waste shipped from the unit. The oxidizer shall maintain a minimum of 70 percent capture efficiency and a minimum of 95 percent destruction efficiency (oxidizes at least 95 percent of the VOC measured as total combustible carbon to carbon dioxide and water).

b) E.U. 011 – VOC emissions shall not exceed 83 tons per any consecutive 12-month period, including cleanup solvent less solvent waste shipped from the unit. The oxidizer shall maintain a minimum of 70 percent capture efficiency and a minimum of 95 percent destruction efficiency (oxidizes at least 95 percent of the VOC measured as total combustible carbon to carbon dioxide and water).

c) E.U. 012 – VOC emissions shall not exceed 83 tons per any consecutive 12-month period, including cleanup solvent less solvent waste shipped from the unit. The oxidizer shall maintain a minimum of 70 percent capture efficiency and a minimum of 95 percent destruction efficiency (oxidizes at least 95 percent of the VOC measured as total combustible carbon to carbon dioxide and water).

[Rule 62-210.200, (PTE), F.A.C., and permit 0950125-005-AC]

Test Methods and Procedures

B6. Each catalytic oxidizer stack must be compliance tested for visible emissions in accordance with DEP Method 9 prior to permit expiration date. The test shall be conducted for 60 minutes.

[Rules 62-297.401(9)(c), 62-297.310(7)(a)4.a., and 62-297.310(4)(a)2., F.A.C.]

B7. DEP Method 9. The provisions of EPA method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

a) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation;

b) EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid 6-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard; and,

2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., 2-minute, 3-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a 6-minute or 2-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

B8. Each unit shall demonstrate compliance with its emission limits for each affected pollutant prior to permit expiration date.

[Rule 62-297.310(7)(a)4.a., F.A.C.]

B9. Compliance with the VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C.

- | | | |
|----|-----------|------------------------------------------------------|
| a) | Method 1 | Sample and Velocity Traverse |
| b) | Method 2 | Volumetric Flow Rate |
| c) | Method 3A | Gas Analysis |
| d) | Method 4 | Determination of the Moisture Content in Stack Gases |

- e) Method 24 Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
- f) Method 24A Determination of Volatile Matter Content and Density of Printing Inks and Related Coatings
- g) Method 25 Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

[Rule 62-297.401, F.A.C.]

B10. The demonstration of the capture efficiency of each unit shall be conducted prior to permit expiration date using the U.S. EPA's VOC Capture Efficiency Test Procedure per Rule 62-297.450, F.A.C. The permittee shall notify the Orange County Environmental Protection Division in writing of the protocol that will be used for the capture efficiency demonstration at least 60 days prior to compliance testing.

[Rule 62-297.450, F.A.C.]

B11. The VOC emissions will be calculated based on actual monthly input and the most recent test results for capture and destruction efficiency. A material balance shall be used to assess and report the annual (consecutive 12 months, verifiable monthly) VOC/solvent emissions associated with clean-up. The material balance will account for any VOC/solvents received, any control measures used (must be quantifiable), and any VOC/solvents shipped off the facility by a properly licensed hauler.

[Permit 0950125-005-AC]

B12. For emissions units whose emissions are controlled by multiple oxidizers, each oxidizer serving the emission unit shall be tested concurrently to prove compliance at one point of operation. Each oxidizer temperature shall be recorded and maintained at no less than the value demonstrated during the most recent compliance test.

[Permit 0950125-005-AC]

B13. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Orange County Environmental Protection Department. 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.

[Rule 62-297.310(7)(a)9, F.A.C.]

B14. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2)& (2) (b), F.A.C.]

Monitoring of Operations

B15. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

B16. The control devices for emissions units 010, 011 and 012 are 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 is an indication that special compliance testing [in accordance with Rule 62-297.310(7)(b), F.A.C.] may be required upon request by the Department.

[40 CFR 64; Rule 62-213.440(4)(b)4., F.A.C.]

Recordkeeping and Reporting Requirements

B17. In order to demonstrate compliance with conditions no. B1, B2, and B5, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

Monthly

- a) Month;
- b) Consecutive 12-month total of VOC material usage and VOC emission rate; and,
- c) Fuel type.

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

B18. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. 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 log and documents shall be kept at the facility for at least 5 years and made available to the Department. Monthly logs shall be completed by the end of the following month.

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

B19. Reports of the required tests required by Specific Condition B9 shall be filed with the Orange County Environmental Protection Division as soon as practical but no later than 45 days after the last test is completed.

[Rule 62-297.310(8), F.A.C.]

40 CFR Part 63, NESHAP Requirements

B20. Each emission unit is subject to the following requirements of 40 CFR Part 63, Subpart A, General Provisions (see attached Appendix, Subpart A):

- 40 CFR 63.1 Applicability (Appendix A page 1)
- 40 CFR 63.2 Definitions (Appendix A page 3)
- 40 CFR 63.3 Units and abbreviations (Appendix A page 8)
- 40 CFR 63.4 Prohibited activities and circumvention (Appendix A page 10)
- 40 CFR 63.5 Construction and reconstruction (Appendix A page 11)
- 40 CFR 63.6 Compliance with standards and maintenance requirements (Appendix A, page 16)
- 40 CFR 63.7 Performance testing requirements (Appendix A page 24)
- 40 CFR 63.8 Monitoring requirements (Appendix A page 31)
- 40 CFR 63.9 Notification Requirements (Appendix A page 38)
- 40 CFR 63.10 Recordkeeping and reporting requirements (Appendix A page 42)
- 40 CFR 63.11 Control device requirements (Appendix A page 50)
- 40 CFR 63.12 State authority and delegations (Appendix A page 50)
- 40 CFR 63.13 Address of State air pollution control agencies and EPA Regional Offices (Appendix A, page 51)
- 40 CFR 63.14 Incorporation by reference (Appendix A page 51)
- 40 CFR 63.15 Availability of information and confidentiality (Appendix A page 53)

[Rule 62-204.800(9), F.A.C. and 40 CFR Part 63, Subpart A]

B21. The facility is subject to the following specific conditions based on Rule 62-204.800(10)(b)21., F.A.C. and 40 CFR Part 63, Subpart KK, for the Printing and Publishing Industry:

1) 40 CFR 63.825 Standards: Product and packaging rotogravure and wide-web flexographic printing.

a) Each permittee of any product and packaging rotogravure or wide-web flexographic printing affected source that is subject to the requirements of this subpart shall comply with these requirements on and after the compliance dates as specified in 40 CFR 63.826 of this subpart.

[40 CFR 63.825(a)]

b) Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The permittee of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs (b)(1) through (b)(10) of this section. The applicant has selected (b)(4) as the compliance procedure.

- 4) Demonstrate that the monthly average as-applied organic HAP content, H_L , of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6.

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j} \quad \text{Eq 6}$$

{Permitting note: The emissions units are required to maintain records with the above referenced standard in accordance with 40 CFR 63, Subpart A, General Provisions, Section 10 (see 40 CFR 63.10, page 42 of Appendix A). The facility may demonstrate compliance with any one of the procedures per (b)(1) through (b)(10).}