



ENVIRONMENTAL PROTECTION DIVISION
Lori Cunniff, CEP, CHMM, Deputy Director
 Community, Environmental and Development Services Department
 800 Mercy Drive, Suite 4
 Orlando, Florida 32808-7896
 407-836-1400 • Fax 407-836-1499
 www.ocfl.net

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

Harry M. Richardson
 Vice President of Production
 Clondalkin Flexible Packaging, Inc.
 1200 Central Florida Parkway
 Orlando, FL 32837-9295

Project No. 0950125-013-AV
 Administrative Correction to:
 Permit No. 0950125-011-AV
 Orange County

Enclosed is the administratively corrected page to Title V Air Operation Permit No. 0950125-011-AV for the operation of the Orlando Printing Facility located in Orange County at 1200 Central Florida Parkway in Orlando, Florida. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request in air construction permit application 0950125-012-AC Attachment G, dated April 30, 2015. The applicant requested modifications to oxidizer temperature monitoring requirements in the CAM Plan of permit 0950125-011-AV. The Title V air operation permit is changed to conform to specific condition 18 of construction permit 0950125-012-AC. This corrective action does not alter the effective dates of the existing permit.

The Orange County Environmental Protection Division (EPD) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions must be filed within 14 days of receipt of this administratively corrected permit. 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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, any email address, telephone number, and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are

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none, the petition must so state; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320) 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 EPD.

Executed in Orange County, Orlando, Florida.



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

(4) JMK/RHP:bh

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit (including the corrected pages) was sent by certified and electronic mail with received receipt requested to the persons listed below:

Harry M. Richardson, Clondalkin Flexible Packaging, Inc. (hrichardson@clondalkingroup.com)
Jerome Guidry, P.E., Perigee Technical Services, Inc. (jerome.guidry@att.net)
Tom Lubozynski, P.E., FDEP Central District (tom.lubozynski@dep.state.fl.us)
Reneé H. Parker, OCEPD (Renee.Parker@ocfl.net)
Ana Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Natasha Hazziez, EPA Region 4 (hazziez.natasha@epa.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Betty Hill
(Clerk)

Nov 3, 2015
(Date)

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The CAM Plan table of permit 0950125-011-AV is revised as indicated. **Strikethrough** is used to denote the deletion of text. **Double-underlines** are used to denote the addition of text. All changes are emphasized with shading.

1. *Applicant Request: Change the table header to read “Emissions Units 011 (W & H Olympia Stellaflex 8L Press (WH3)) and 012 (Tachys FNC 3000 Press (FT4)) VOC Emissions Controlled by a Megtec Magnum Model MAG-180-70-6-C Catalytic Recuperative Oxidizer (Oxidizer B). Emissions Units 013 (Comexi CNC GL 8-color flexographic press) VOC Emissions Controlled by a W R Grace and Company TEC Systems Magnum Oxidizer.”*

EPD Response: CAM Plans are part of a Title V operation permit, and are generally not addressed in a construction permit. The EPD changed some oxidizer temperature monitoring requirements in permit 0950125-012-AC. This provides justification for an administrative correction of the 0950125-011-AV permit CAM Plan. The correction only applies to the CAM Plan for the existing oxidizer, Oxidizer B. There is no need for a CAM Plan for Oxidizer A until an operation permit is issued for it. When the 0950125-011-AV permit is revised to incorporate the new press and oxidizer authorized by permit 0950125-012-AC, the CAM Plan for the new press and Oxidizer A will be added as a separate table in Appendix CAM of the operation permit. By that time the new oxidizer and press will have been constructed and will have passed a compliance test, and a new catalyst inlet temperature will be established by the compliance test. That new catalyst inlet temperature will be part of the CAM Plan for Oxidizer A. The request for this change cannot be granted at this time.

2. *Applicant Request: Change the CAM condition, II Indicator Range for Indicator No. 1 and Indicator No. 2 to read “...excluding periods of malfunction (the oxidizer runs constantly, there is no start-up or shutdown), and periods when the presses are not in operation and VOCs are not being fed to the incinerator or when VOC emissions are very low; excursions trigger...”*

EPD Response: The 0950125-011-AV operation permit CAM Plan requires the facility to monitor catalyst inlet and outlet gas temperatures. For Indicator 1, the inlet gas temperature, the facility must maintain the inlet gas temperature above the temperature at which compliance was demonstrated in the last compliance test. The CAM Plan also requires the facility to maintain the catalyst outlet gas temperature (Indicator 2) equal to or greater than the catalyst inlet gas temperature. However, the facility has observed a drop in outlet gas temperature below the inlet gas temperature, but this only occurs when an oxidizer is operating and the presses it controls are not operating. Thus, there is no VOC loading on the oxidizer, or VOC emissions from the oxidizer, but an indication of a CAM Plan violation occurs. Both EPD and the facility want to avoid an indication of a permit violation when no emissions occur.

The facility contacted the oxidizer manufacturer about the drop in gas temperature. The manufacturer, MEGTEC Systems, responded with a letter dated January 14, 2015. The letter stated that it is not uncommon to see the temperature at the outlet side of the catalyst bed lower than the temperature on the inlet side when VOC levels are very low (such as when the presses are not operating). The letter stated further that this is not necessarily an indication of poor destruction efficiency, but rather that total oxidization has taken place very quickly, in the top part of the catalyst bed.

The facility consultant discussed this temperature drop issue with EPD staff before the facility submitted the 0950125-012-AC application. EPD compliance inspectors and permitting staff observed the temperature data and discussed this issue with the facility maintenance personnel during a facility inspection on March 31, 2015. The EPD’s conclusion was that the manufacturer’s explanation was satisfactory. The EPD also concluded that there were no significant emissions from the oxidizer when the presses were not operating. The EPD decided to change the temperature monitoring conditions in

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the 0950125-012-AC construction permit, to avoid possible CAM Plan violations when no pollutants were emitted. Specific condition 18 of permit 0950125-012-AC lists catalyst gas temperature monitoring requirements. The requirement to maintain a minimum catalyst inlet gas temperature applies only during periods when a press is operating and emitting VOC or HAP to the oxidizer. Thus, temperature maintenance requirements are relaxed when the presses are not operating. The same rationale also applies to the CAM Plan requirement that the catalyst outlet gas temperature be maintained equal to or greater than the inlet gas temperature, when the presses are not operating.

The EPD agrees that oxidizer temperature monitoring requirements can be relaxed when the presses are not operating. However, the phrase "...when VOC emissions are very low;" is not defined sufficiently to provide reasonable assurance that VOC emissions can be determined accurately. The EPD changed Indicator Range requirements for Indicator No. 1 and Indicator No. 2 to comply with the applicant's request, except for the low VOC emissions phrase. The changes are indicated in the CAM Plan below and in the attached corrected CAM Plan.

The company name on the footer of the corrected page was changed to show the owner name change from Spiralkote to Clondalkin.

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COMPLIANCE ASSURANCE MONITORING PLAN

Emissions Units 011 (W & H Olympia Stellaflex 8L Press (WH3)) and 012 (Tachys FNC 3000 Press (FT4)) VOC Emissions Controlled by a Megtec Magnum Model MAG-180-70-6-C Catalytic Recuperative Oxidizer (Oxidizer B).

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Catalyst inlet gas temperature	Catalyst outlet gas temperature
Measurement Approach	Catalyst inlet gas temperature is monitored immediately before the oxidizer	Catalyst outlet gas temperature is monitored immediately after the oxidizer
II. Indicator Range	An excursion is defined as a temperature reading less than 650°F, excluding periods of malfunction (the oxidizer runs constantly, there is no startup or shutdown); excursions trigger an automatic shutdown of the printing presses, an inspection of the oxidizer and corrective action. <u>The requirement to maintain a minimum oxidizer catalyst inlet gas temperature applies only during periods when a press is operating and emitting VOC or HAP to the oxidizer.</u>	An excursion is defined as a temperature reading that is not equal to or greater than the catalyst inlet gas temperature, excluding periods of malfunction (the oxidizer runs constantly, there is no startup or shutdown); excursions trigger an automatic shutdown of the printing presses, an inspection of the oxidizer and corrective action. <u>The requirement to maintain a temperature reading that is equal to or greater than the catalyst inlet gas temperature applies only during periods when a press is operating and emitting VOC or HAP to the oxidizer.</u>
III. Performance Criteria		
A. Data Representativeness	The monitor is located immediately before the oxidizer. A Yokogawa 30-day strip chart recorder with a temperature range of 0-2000°F or equivalent records the inlet temperature.	The monitor is located immediately after the oxidizer. A Yokogawa 30-day strip chart recorder with a temperature range of 0-2000°F or equivalent records the outlet temperature.
B. Verification of Operational Status	Oxidizer is always on	Oxidizer is always on
C. Quality Assurance and Control Practices and Criteria	Strip chart recorder will be calibrated annually in accordance with the manufacturer's specifications.	Strip chart recorder will be calibrated annually in accordance with the manufacturer's specifications.
D. 1. Monitoring Frequency	Measured Continuously.	Measured Continuously.
D. 2. Data Collection Procedures	Recorded continuously on a strip chart recorder or electronic data logger	Recorded continuously on a strip chart recorder or electronic data logger
D. 3. Averaging Period	5 minutes	5 minutes

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING

COMPLIANCE ASSURANCE MONITORING PLAN

Emissions Units 011 (W & H Olympia Stellaflex 8L Press (WH3)) and 012 (Tachys FNC 3000 Press (FT4)) VOC Emissions Controlled by a Megtec Magnum Model MAG-180-70-6-C Catalytic Recuperative Oxidizer (Oxidizer B).

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Catalyst inlet gas temperature	Catalyst outlet gas temperature
Measurement Approach	Catalyst inlet gas temperature is monitored immediately before the oxidizer	Catalyst outlet gas temperature is monitored immediately after the oxidizer
II. Indicator Range	An excursion is defined as a temperature reading less than 650°F, excluding periods of malfunction (the oxidizer runs constantly, there is no startup or shutdown); excursions trigger an automatic shutdown of the printing presses, an inspection of the oxidizer and corrective action. The requirement to maintain a minimum oxidizer catalyst inlet gas temperature applies only during periods when a press is operating and emitting VOC or HAP to the oxidizer.	An excursion is defined as a temperature reading that is not equal to or greater than the catalyst inlet gas temperature, excluding periods of malfunction (the oxidizer runs constantly, there is no startup or shutdown); excursions trigger an automatic shutdown of the printing presses, an inspection of the oxidizer and corrective action. The requirement to maintain a temperature reading that is equal to or greater than the catalyst inlet gas temperature applies only during periods when a press is operating and emitting VOC or HAP to the oxidizer.
III. Performance Criteria		
A. Data Representativeness	The monitor is located immediately before the oxidizer. A Yokogawa 30-day strip chart recorder with a temperature range of 0-2000°F or equivalent records the inlet temperature.	The monitor is located immediately after the oxidizer. A Yokogawa 30-day strip chart recorder with a temperature range of 0-2000°F or equivalent records the outlet temperature.
B. Verification of Operational Status	Oxidizer is always on	Oxidizer is always on
C. Quality Assurance and Control Practices and Criteria	Strip chart recorder will be calibrated annually in accordance with the manufacturer's specifications.	Strip chart recorder will be calibrated annually in accordance with the manufacturer's specifications.
D. 1. Monitoring Frequency	Measured Continuously.	Measured Continuously.
D. 2. Data Collection Procedures	Recorded continuously on a strip chart recorder or electronic data logger	Recorded continuously on a strip chart recorder or electronic data logger
D. 3. Averaging Period	5 minutes	5 minutes