Department of Environmental Protection

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

Jeb Bush
Governor

Colleen M. Castille
Secretary

ELECTRONIC MAIL
flexstar@earthlink.net

Rita Friedman, President
Flexstar Packaging, Inc.
1200 Charles Street
Longwood, FL 32750-5414

Re: Title V Air Operation Permit
PROPOSED Permit No.: 1170040-008-AV
Printing Facility

Dear Ms. Friedman:

One copy of the PROPOSED PERMIT DETERMINATION for the PROPOSED Title V Air Operation Permit for the Printing Facility located at 1200 Charles Street, Longwood, Seminole County, Florida is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

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

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

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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

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

Sincerely,

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

Date 12-19-06

LTK/jt
Enclosures
cc: Joseph Stine, P.E. **(stinejoe@earthlink.net)**
Caroline Shine, FDEP
Barbara Friday, BAR **[Barbara.Friday@dep.state.fl.us]** (for posting with Region 4, U.S. EPA)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1170040-008-AV

I. Public Notice.

An "INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" to Flexstar Packaging, Inc., located at 1200 Charles Street, Longwood, Seminole County, Florida was clerked on November 13, 2006. The "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT " was published in the **Sanford Herald** newspaper on November 19, 2006. The DRAFT Title V Air Operation Permit was available for public inspection at the permitting authority's office in Orlando. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" was received on November 29, 2006.

II. Public Comment(s).

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

III. Conclusion.

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

Flexstar Packaging, Inc.
Printing Facility
Facility ID No.: 1170040
Seminole County

PROPOSED Permit No.: 1170040-008-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/893-3335
Fax: 407/897-5963

PROPOSED TITLE V Permit No.: 1170040-008-AV

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2
Subsection A. Facility Description.	
Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
Subsection C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions	
Subsection A. 003 - Printing Facility	6
Appendix I-1, List of Insignificant Emission Units and/or Activities	
Appendix TV-6, Title V Conditions	
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers	
Appendix H-1, Permit History / ID Number Changes	
Statement of Basis	

Department of Environmental Protection

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Central District
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Colleen M. Castille
Secretary

Permittee:
Flexstar Packaging, Inc.
1200 Charles Street
Longwood, FL 32750-5414

PROPOSED Permit No.: 1170040-008-AV
Facility ID No.: 1170040
SIC Nos.: 2751
Project: Title V Air Operation Permit

Attention: Rita Friedman, President

This is a Title V operation permit for the Printing Facility. This facility is located at 1200 Charles Street, Longwood, Seminole County; UTM Coordinates: Zone 17, 465.8 km East and 3173.4 km North; Latitude: 28° 41' 19" North and Longitude: 81° 21' 01" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emission Units and/or Activities
Appendix TV-6, Title V Conditions

Effective Date:	**to be determined**
Renewal Application Due Date:	**June 30, 2011**
Expiration Date:	**December 30, 2011**

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

LTK/azt

Section I. Facility Information.

Subsection A. Facility Description.

A printing facility identified as emissions unit 003 (EU 003) that includes four printing presses. The facility uses flexographic printing equipment to print on plastic sheeting or film. The printed film is either slit and rolled or made into finished bags. Printing is accomplished using four printing presses. Presses #1 and #4 are both stack presses. Press #1 has six printing stations and is capable of printing six ink colors; press #4 has four stations and is capable of printing four ink colors. Presses #2 and #3 are both central impression presses, each with six printing stations and capable of printing six ink colors. Natural gas-fired dryers are used to dry the inks from presses #1, #2 and #3, and an electric dryer is used for press #4.

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

Based on the Title V permit renewal application received July 12, 2006, this facility is a **minor** source of hazardous air pollutants (HAPs).

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

E.U. ID No.	Brief Description
003	Printing Facility

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

Subsection C. Relevant Documents.

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

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

These documents are on file with permitting authority:
Initial Title V Operation Permit Application received June 10, 1996
Initial Title V Operation Permit issued December 31, 1997
Air Construction Permit Application received July 27, 1998
Air Construction Permit Application received January 11, 1999
Application for a Title V Operation Permit Revision received February 29, 2000
Revised Title V Operation Permit issued October 3, 2000
Application for a Title V Operation Permit Renewal received September 6, 2001
Application for a Title V Operation Permit Renewal received July 12, 2006

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 the air compliance section of this office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3336
Fax: 407/897-5963

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 air compliance section of this office.
[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 subsection addresses the following emissions unit(s).

E.U. ID No.	Brief Description
003	A printing facility identified as emissions unit 003 (EU 003) that includes four printing presses. The facility uses flexographic printing equipment to print on plastic sheeting or film. The printed film is either slit and rolled or made into finished bags. Printing is accomplished using four printing presses. Presses #1 and #4 are both stack presses. Press #1 has six printing stations and is capable of printing six ink colors; press #4 has four stations and is capable of printing four ink colors. Presses #2 and #3 are both central impression presses, each with six printing stations and capable of printing six ink colors. Natural gas-fired dryers are used to dry the inks from presses #1, #2 and #3, and an electric dryer is used for press #4.

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

Essential Potential to Emit (PTE) Parameters

A1. The drying ovens shall be fired with natural gas or propane only and the maximum permitted heat input rate for each fuel fired drying oven is 10,512 MMBTU per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1170040-004-AC]

A2. The hours of operation are not limited.
[Rule 62-210.200, (PTE), F.A.C. and Title V permit renewal received 6/12/06]

Emission Limitations and Standards

A3. Each particulate emission source is subject to the general visible emission standard as specified by facility-wide condition no. 3.

A4. The maximum permitted facility-wide VOC emission rate shall not exceed 249.0 tons per consecutive twelve months, updated monthly.
[Construction permit 1170040-004-AC]

A5. The maximum permitted facility-wide emission rate of HAPs shall individually be limited to less than 10.0 tons per consecutive 12 months and combined be limited to less than 25.0 tons per consecutive twelve months, updated monthly.
[Construction permit 1170040-004-AC]

Test Methods and Procedures

A6. The exhaust stacks from each particulate emission source must be compliance tested for visible emissions in accordance with DEP Method 9 prior to permit expiration date. The test shall be conducted for 30 minutes or the length of the batch/cycle.
[Rules 62-297.401(9)(c), 62-297.310(7)(a)4.a., and 62-297.310(4)(a)2., F.A.C.]

A7. DEP Method 9. The provisions of EPA Method 9 (40CFR60, 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 possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

A8. 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 air compliance section of this office. 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.]

A9. 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.]

A10. Reports of the required tests shall be filed with the Department's Central District air program as soon as practical but no later than 45 days after the last test is completed.
[Rule 62-297.310(8), F.A.C.]

Monitoring of Operations

A11. 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.]

Recordkeeping and Reporting Requirements

A12. In order to demonstrate compliance with specific conditions A4 and A5 the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:
Monthly

a) Designation of the month and year of operation for which the records are being tabulated;
b) Consecutive 12-month total of VOC-containing material usage;
c) The mass fraction of VOC present in each VOC-containing material used;
d) Consecutive 12-month total of HAP-containing material usage;
e) The mass fraction of HAP present in each HAP-containing material used;
f) Consecutive 12-month total of VOC emissions, including cleanup solvents; and,
g) Consecutive 12-month total of individual and combined HAP emissions.

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

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.
[Rule 62-4.070(3), F.A.C.]

A13. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24A, 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 Department 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 log and documents shall be kept at the facility for at least five years and made available to the Department. Daily logs shall be completed within seven business days and the 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.]

A14. Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.
[Rule 62-297.310(8), F.A.C.]

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

Flexstar Packaging, Inc.
Printing Facility

PROPOSED Permit No.: 1270040-008-AV
Facility ID No.: 1270040

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 Rule 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 Rule 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. Fork lift.

2. Brazing, soldering, and welding equipment.

3. Fire and safety equipment including fire extinguishers.

4. Corn starch application process.

5. Slitting process.

6. Bag making process.

1 of many

APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)

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

{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

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

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

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

Abbreviations and Acronyms:

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

Citations:

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

Code of Federal Regulations:

Example: **[40 CFR 60.334]**

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

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

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

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

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

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

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

Permit Numbers:

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

Where:

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

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

Where:

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

Appendix H-1: Permit History/ID Number Changes

Flexstar Packaging, Inc.
Printing Facility

PROPOSED Title V Operation Permit No.: 1170040-008-AV
Facility ID No.: 1170040

Permit History (for tracking purposes)

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Project Type
- 001	Printing Press #1	AC59-164192	09/15/89	08/15/91	Construction Permit
		AO59-172201	12/21/89	06/30/98	Operation Permit
		AC59-274995	10/09/95	06/01/99	Construction Permit
- 002	Printing Press #2	AC59-186762	11/08/90	10/25/92	Construction Permit
		AO59-172201	09/01/91	07/25/96	Operation Permit
		AO59-274995	10/09/95	06/01/99	Operation Permit
- 003	Flexographic Printing Facility	1170040-002-AV	12/31/97	12/30/01	Initial Title V Operation Permit
		1170040-003-AC	12/09/98	09/30/03	Construction Permit
		1170040-004-AC	04/05/99	09/30/04	Construction Permit
		1170040-005-AV	10/03/00	12/30/01	Revised Title V Operation Permit
		1170040-006-AV	5/13/02	12/30/06	Renewed Title V Permit

STATEMENT OF BASIS

Flexstar Packaging, Inc.
Printing Facility
Facility ID No.: 1170040
Seminole County

Title V Air Operation Permit Renewal
PROPOSED Title V Air Operation Permit No.: 1170040-008-AV

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

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

Flexstar Packaging, Inc., operates a printing facility identified as emissions unit 003 (EU 003). The facility uses flexographic printing equipment to print on plastic sheeting or film. The printed film is either slit and rolled or made into finished bags. Printing is accomplished using four printing presses. Presses #1 and #4 are both stack presses. Press #1 has six printing stations and is capable of printing six ink colors; press #4 has four stations and is capable of printing four ink colors. Presses #2 and #3 are both central impression presses, each with six printing stations and capable of printing six ink colors. Natural gas-fired dryers are used to dry the inks from presses #1, #2 and #3, and an electric dryer is used for press #4.

The applicable emission limitations are as follows:

E.U. 003 - The facility is subject to: the General Visible Emissions (VE) limit of less than 20 percent per Rule 62-296.320(4)(b)1., F.A.C.; VE tests conducted in 1999 and in 2001 showed no VE coming from the facility, so VE testing is required once every five years; the General Volatile Organic Compound (VOC) standard per Rule 62-296.320(1)(a), F.A.C.; the Objectionable Odor Rule per Rule 62-296.320(2), F.A.C.; 1170040-004-AC: air construction permit, which limited single hazardous air pollutants (HAPs) to less than 10 tons per consecutive 12-month period and combined HAPs to less than 25 tons per consecutive 12-month period; and, AC59-274995: air construction permit, which limited VOCs from the facility to a maximum of 249 tons per consecutive 12-month period.

Based on the initial Title V Air Operation Permit application received June 12, 1996, and air construction permits, Nos. 1170040-003-AC and 1170040-004-AC, this facility is a synthetic minor source of HAPs, therefore the facility is not subject to a NESHAP standard.