



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

September 16, 2005

Mr. Mark Neumann, C.F.E., ASA, Director
Personal Property Division
Department of Property Appraisal
111 NW 1st Street, Suite 710
Miami, Florida 33128-1984

Re: St. Ives, Inc. Folio 01-700580

Dear Mr. Neumann:

I have reviewed the material attached to your FAX of September 15, 2005, including the letter dated June 22, 2005. The material provided is sufficient to demonstrate that the Thermal Oxidizer is pollution control equipment that is "primarily for the purpose of pollution control" and is eligible for assessment as pollution control devices pursuant to §193.621, Florida Statutes.

If there are any questions on this determination, please contact me at (850) 245-8002.

Sincerely,

Hamilton S. Oven
Hamilton S. Oven, P.E.



Department of Property Appraisal
Personal Property Division
111 NW 1st Street • Suite 710
Miami, Florida 33128-1984
T 305-375-4070 F 305-375-3024

miamidade.gov

June 22, 2005

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Section
Marjory Stoneman Douglas Building
3900 Commonwealth Blvd
Tallahassee, FL 32399-3000

Re: St. Ives Inc., Avanti

Dear Mr. Oven:

I am forwarding to you a copy of the information sent to us for a Regenerative Thermal Oxidizer-M1000 to be considered for pollution classification. Let me point out that this is the first time we have received information on this equipment.

Please review and advise us whether or not you believe this system is entitled to the pollution classification. Thank you for your time.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Neumann", with a stylized, flowing script.

Mark Neumann, CFE, ASA
Division Director

MN/mh
OVNEFI80.WPS.



St. Ives Inc., Avanti
13449 NW 42 Ave
Miami, FL 33054

June 9, 2005

Department of Property Appraisal
Personal Property Division
111 NW 1st Street • Suite 710
Miami, Florida 33128-1984
T 305-375-4070 F 305-375-3024

miamidade.gov

Attn: Anita Phen

Dear Taxpayer:

We are in receipt of your application (DR 492-RETURN OF POLLUTION CONTROL DEVICES FOR AD VALOREM TAX PURPOSES for folios #: 01-700580)

In accordance with your request and Florida Statute 193.621(5) and Department of Revenue, Ad Valorem Tax Assessment Rules, Chapter 62.8, we are requesting that you submit the following information for consideration in determining whether the facilities claimed are used primarily for pollution control purposes and subject to assessment under Chapter 193.621 of the Florida Statutes:

In considering an assessment for ad valorem taxes under Section 193.621, Florida Statutes, the tax assessor may utilize the following guidelines in determining whether the facilities claimed are used primarily for pollution control purposes and subject to assessment under Chapter 193, Florida Statutes:

- 1) If the person owning or responsible for operation of the facility secured approval of such equipment prior to its installation, in accordance with the rules and regulations of the Board.
- 2) Upon written request by a tax assessor, the Florida Pollution Control Board will determine the applicable use of a facility with respect to subsection 193.621(1), Florida Statutes. For this purpose the applicant must submit to the assessor, for submission to the Department, the following information prepared by a professional engineer registered in the State of Florida:
 - (a) Plans and specifications and related documents describing the equipment alleged to be used for pollution control. Plans or other information relative to the process which is controlled, adequate in scope to validate the claim for the proposed control equipment.
 - (b) A list of pollution control equipment which the applicant declares subject to assessment under Chapter 193, Florida Statutes, certified as to its true primary use by the engineer. The assessor may require on the equipment list the salvage value of each item.
 - (c) The original installed cost and year of acquisition for these assets.

As required by DOR Chapter 62.8, the above information must be prepared by a professional engineer registered in the State of Florida.

The information submitted will be forwarded to the Florida Pollution Control Board, Department of Environmental Regulation, State of Florida, for their review and recommendation.

If there are any questions, you may contact Mark Neumann at (305) 375-4070.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joel Robbins".
Joel Robbins
Property Appraiser
Delivering Excellence Every Day

ST IVES**US Division****ST IVES INC HOLLYWOOD****ST IVES INC CLEVELAND****AVANTI-CASEHOYT INC****THE CASE HOYT CORPORATION**2025 McKinley Street
Hollywood, Florida 33020
954.920.73004437 East 49th Street
Cleveland, Ohio 44128
216.271.6300
800.634.126213449 NW 42nd Avenue
Miami, Florida 33054
305.685.7381
800.327.7486100 Beaver Road
Rochester, New York 14624
716.889.5670
800.333.0944

June 17, 2005

Miami Dade County
Dept of Property Appraisal
Personal Property Division
111 NW 1st Street
Suite 710
Miami, FL 33128-1984
Attn: Joel Robbins**RECEIVED**
JUN 20 2005
MIAMI-DADE COUNTY
PROPERTY APPRAISAL DEPARTMENT

RE: DR 492-Return of Pollution Control Devices for Ad Valorem Tax Purposes for folios #: 01-700580

Dear Mr. Robbins:

Attached is the information requested in connection to the above. Please let me know if you need anything further. You may contact me at 305-685-7381 XT 403.

Sincerely,

Anita Phen
St Ives Inc Avanti
Controller

St Ives Inc Avanti
Fixed Assets - Machinery & Equipment
December-04

<u>System#</u>	<u>Activity</u> <u>Code</u>	<u>Class</u>	<u>Acq date</u>	<u>Tax</u> <u>In svc date</u>	<u>Description</u>	<u>Acquired</u> <u>Acq Value</u>
30983	A	ME	Dec-04	Dec-04	Regenerative thermal oxidizer-m1000 & komorl prr	847,468
					2004	847,468

MIAMI-DADE COUNTY, FLORIDA**MIAMI-DADE**

ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
39 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

August 18, 2004

NOTICE OF AIR POLLUTION PERMIT

CERTIFIED MAIL: 7000 0600 0025 3505 0331
RETURN RECEIPT REQUESTED

ISSUED TO:

Ms. Jeanne M. Caruana
Executive VP, CFO
St. Ives Avanti
13449 NW 42 Avenue
Miami, FL 33054

Permit Number: 0250479-003-AC
Issue Date: August 18, 2004
Expiration Date: August 17, 2005

Project: Air Construction Permit to modify conditions in Construction Permit AC-13-215233 and replace existing catalytic oxidizers with a Regenerative Thermal Oxidizer (RTO).

Facility Description: Facility engages in Commercial Printing (SIC/NAICS # - 2759/323119).

Location: 13449 NW 42 Avenue, Miami, Miami-Dade, FL 33054

Lat./Long: 25° 53' 11" N / 80° 16' 05" W

This is Permit Number 0250479-003-AC to construct an air pollution source issued by the Miami-Dade County, Department of Environmental Resources Management (DERM) pursuant to Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.). This is a construction permit authorizing the construction of the emissions units described in the permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the DERM as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the DERM the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and in conformance with all existing regulations of the FDEP and the DERM rules. The above named owner or operator is hereby authorized to perform the work or construct the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the DERM and made a part hereof and specifically described in this permit.

St Ives Avanti

File Number 0250479-003-AC

PERMIT CONTENTS:

Part I -- Summary Information

Part II -- Facility-Wide Specific Conditions

Part III -- Emission Unit Specific Conditions

Appendix A -- General Conditions

PART I -- SUMMARY INFORMATION

This permit addresses the following air pollution emission unit(s):

Emissions Unit Number	Emissions Unit Description
008	Two Printing Presses with emissions controlled by an Advanced Energy Group (AEG) Regenerative Thermal Oxidizer

* Note: Printing Presses are existing

SIGNIFICANT DATES:

Application Received on March 23, 2004

REGULATORY CLASSIFICATION

This facility is classified as a non-Title V minor source of air pollution.

PERMIT HISTORY:

Permit 0250479-002-AO was issued on November 24, 2003; Expiration Date: November 23, 2008.
Permit 0250479-001-AO was issued on October 22, 1998; Expiration Date: October 21, 2003
Permit AO-13-220074 was issued on September 28, 1993; Expiration Date: September 30, 1998
Permit AC-13-216233 was issued on August 26, 1992; Expiration Date: December 15, 1992
Permit AC-13-201431 was issued on January 2, 1992; Expiration Date: December 15, 1992
Permit AO-13-111925 was issued on January 6, 1986; Expiration Date: December 30, 1990
Permit AC-13-098943 was issued on June 3, 1985; Expiration Date: November 30, 1985

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS**1.0 Administrative Requirements**

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section located at 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540.
- 1.2 Citation Format: In this permit, references to F.A.C. Rule 62.xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.

St Ives Avanti

File Number 0250479-003-AC

- 1.3 **Specific and General Conditions:** The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S.
[Rule 62-4.160 F.A.C.]
- 1.4 **Applicable Regulations:** This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 **Waste Dispose:** The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 **Other Permits:** This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the DERM or other departments or agencies.
- 1.7 **Operation Permit Required:** This permit authorizes construction and/or installation of the permitted emission unit(s) and initial operation to determine compliance with the FDEP and the DERM rules. An operation permit is required for regular operation of the permitted emission units. The owner or operator shall apply for and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in triplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions on the construction permit, compliance test results, and such additional information as the DERM may by law require.
[Rule 62-4.030, 62-4.050, 62-4.220, and 62-210.300 F.A.C.]
- 1.8 **Extension of This Permit:** The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County, Department of Environmental Resources Management, Air Facilities Section at least 60 days prior to the expiration date of this permit.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]
- 2.0 **General Pollutant Emission Limiting Standards**
- 2.1 **Objectionable Odor Prohibited:** No person shall 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.]
- 2.2 **General Visible Emissions Standard:** Unless otherwise specified by permit or rule, 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 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]
- 2.3 **Volatile Organic Compounds/Organic Solvents Emissions:**
No person shall 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 emission control devices or systems deemed necessary and ordered by the DERM.

St Ives Avanti

File Number 0250479-003-AC

Such controls include the following:

- Tightly cover or close all VOC containers when they are not in use.
 - Tightly cover all open tanks, which contain VOCs when they are not in use.
 - Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
 - Confine rags used with VOCs to tightly closed, fireproof containers when not in use.
 - Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1) F.A.C.]

2.4 Unconfined Emissions of 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 include the following:

- Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
 - Confining abrasive blasting where possible.
 - Enclosure or covering of conveyor systems.
 - Substitution of powdery materials with granular or pelletized materials, where possible.
- [Rule 62-296.320(4)(c) F.A.C.]

3.0 Operation Requirements

- 3.1 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.]

- 3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing the best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the DERM for longer duration.
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
- [Rule 62-210.700 F.A.C.]

4.0 Compliance Testing Requirements

- 4.1 Test Notification: Unless otherwise specified in this permit, the DERM Air Facilities Section shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
- [Rule 62-297.310(7)(a) 9 F.A.C.]

St Ives Avanti

File Number 0250479-003-AC

- 4.2 **Testing at Capacity:** Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2) F.A.C.]
- 4.3 **Special Compliance Tests:** When the DERM, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 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 and to provide a report on the results of said tests to the DERM.
[Rule 62-297.310(7)(b) F.A.C.]
- 5.0 **Reporting and Record Keeping Requirements**
- 5.1 **Report Excess Emissions:** In case of excess emissions resulting from malfunctions, each owner or operator shall notify the DERM in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the DERM.
[Rule 62-210.700(6) F.A.C.]
- 5.2 **Report Plant Operation Problems:** If the owner or operator 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 owner or operator shall immediately notify the DERM. 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 owner or operator from any liability for failure to comply with the FDEP and the DERM rules.
[Rule 62-4.130 F.A.C.]
- 5.3 **Retain Records:** All records required by this permit shall be kept by the owner or operator and made available for the DERM inspection for a minimum of three (3) years from the date of such records.
[Rule 62-4.160(14)(b) F.A.C.]
- 5.4 **Compliance Test Reports:** Compliance test reports (when required) shall be submitted to the DERM Air Facilities Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8)(a) & (b) F.A.C.]

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the DERM to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - All measured and calculated data required to be determined by each applicable test procedure for each run.
 - The detailed calculations for one run that relate the collected data to the calculated emission rate.
-

St Ives Avanti

File Number 0250479-003-AC

- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

5.5 Annual Operating Report Required: On or before March 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operating Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section. Included with this report shall be any additional reports, if any, required by this permit in Part III - Emission Unit Specific Conditions.
[Rule 62-210.370(3) F.A.C.]

St Ives Avanti

File Number 0250479-003-AC

PART III -- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
008	Two Printing Presses with emissions controlled by an Advanced Energy Group (AEG) Regenerative Thermal Oxidizer (RTO): • Printing Presses - Komori S-38, 38", 5 Unit Printing Press - Maximum press speed 1,600 fpm. 38-Inch web, 5 printing units and a TEC drier. - Harris M-1000B, 8 Unit Double Web Press - Maximum press speed 2,000 fpm. 8-unit web press with TEC double drier. • Advanced Energy Group (AEG) Regenerative Thermal Oxidizer - Natural Gas Fired- 4.3 MMBtu/hr consumed during start up - Designed for 17,000 scfm - Destruction Efficiency 99% for VOC - Minimum Operating Temperature- 1450 F - Minimum Set Point Temperature: 1500 F - Typical Operating Temperature greater than 1500 F - Throughput Rate 416 lbs of solvent @ 18,600 Btu/Lb - Single Vertical Steel Stack - 36" I.D.

* Note: Printing Presses are existing

1.0 This permit supersedes previously issued Permit No. AC 13-215233.

2.0 Emissions Limiting Standards and Operation Restrictions

2.1 Visible Emissions: Visible emissions shall not equal or exceed 20% opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]

2.2 Facility Wide VOC Emissions: Facility-wide total emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), shall not equal or exceed 100 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]

2.3 Facility Wide HAP Emissions: Facility-wide total emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 25 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]

2.4 Individual HAP Emissions: Facility-wide total emissions of any individual hazardous air pollutant (HAP) shall not equal or exceed 10 tons in any consecutive 12-month period.
[Rule 62-4.070(3) F.A.C.]

2.5 Operating Temperature: Whenever any press is in operation the RTO shall be maintained to have a minimum operating temperature of 1450°F.
[Rule 62-4.070(3) F.A.C.]

2.6 Allowable Fuel: Fuel for the RTO shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.]

St Ives Avant

File Number 0250479-003-AC

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- 2.7 Hours of Operation: The referenced emission unit(s) may operate continuously, i.e. 8,760 hours per year.
[Rule 62-4.070(3) F.A.C]
- 3.0 **Compliance Monitoring and Testing Requirements**
- 3.1 Testing Requirements: To demonstrate compliance with the emission limiting standards of this permit, the permittee shall demonstrate the VOC/HAP destruction efficiency by using EPA Method 25 or 25A. A destruction efficiency test shall be performed within forty-five (45) days after the startup of the RTO.
[Rule 62-4.070(3) F.A.C]
- 3.2 Testing Frequency: The permittee shall perform a destruction efficiency test annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a compliance test report to the Miami-Dade County, Department of Environmental Resources Management (DERM).
[Rule 62-4.070(3) F.A.C]
- 3.3 Monitoring Equipment: Monitoring equipment shall continuously monitor and record the RTO chamber temperatures. The permittee shall operate, maintain, and calibrate the monitoring equipment in accordance with the manufacturer's recommendations.
[Rule 62-4.070(3) F.A.C]
- 4.0 **Reporting and Record Keeping Requirements**
- 4.1 VOC Content and Emissions: The permittee shall determine the VOC content of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The VOC content for each material containing or emitting VOCs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).
 - The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
 - A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.
- [Rule 62-4.070(3) F.A.C]
- 4.2 HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, shall monitor the usage of such materials at the referenced emissions unit(s), and shall record and maintain the following information:
- The individual and total HAP contents for each material containing or emitting HAPs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s).
 - The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
 - A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.
- [Rule 62-4.070(3) F.A.C]
- 4.3 RTO Temperatures: Records of the RTO chamber temperature from the monitoring equipment shall be maintained and made available for the inspectors.
[Rule 62-4.070(3) F.A.C]
-

: Ives Avanti

File Number 0250479-003-AC

- 4.4 Equipment Calibration: The date, the name of the technician, and procedures for performing the calibration on the continuous temperature monitoring system shall be documented. Such records shall be kept in a maintenance log and made available for the inspectors. Additionally, maintenance and repair activities on the RTO shall be documented and included in the maintenance log.
[Rule 62-4.070(3) F.A.C.]
- 4.5 Recycling Log: The owner or operator shall record and maintain the amount of chemicals manifested to recyclers, the manufacturer or the dump.
[Rule 62-4.070(3) F.A.C.]

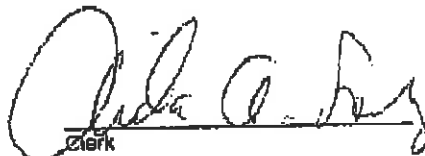
Executed in Miami-Dade County, Florida.

DEPARTMENT OF ENVIRONMENTAL
RESOURCES MANAGEMENT
H. Patrick Wong, Chief
Air Quality Management Division8/18/04
Date/

HPW/mg

Copy: Tom Tittle, Florida Department of Environmental Protection, Southeast District Office
James T. Show, P.E., Grove Scientific & Engineering Company, 6140 Edgewater Drive Suite F, Orlando,
FL 32810

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated DERM Clerk, receipt of which is hereby acknowledged.


Clerk8/18/04
Date

**APPENDIX A
GENERAL CONDITIONS**

- (b) The period of noncompliance, including exact 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 DERM for penalties or for revocation of this permit.
9. 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 DERM, may be used by the DERM as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or DERM's 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.
10. The permittee agrees to comply with changes in DERM's 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 DERM's rules.
11. This permit is transferable only upon DERM approval in accordance with Rule 62-4.120 and 62-30.300, Florida Administrative Code (F.A.C.), as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the DERM.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. The permittee shall comply with the following :
- (a) Upon request, the permittee shall furnish all records and plans required under DERM's rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the DERM.
- (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 three years from the date of the sample, measurement, report or application unless otherwise specified by DERM's rule.
- (c) Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. When requested by the DERM, 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 DERM, such facts or information shall be submitted or corrected promptly.

MIAMI-DADE COUNTY, FLORIDA

MIAMI-DADE

AIR EMISSIONS
RENEWAL APPLICATIONENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
35 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

PERMITEE:

Ms Jeanne M Caruana
ST. IVES INC. AVANTI
13449 NW 42 AVENUE
MIAMI, FL 33054-

May 02, 2005

BUSINESS LOCATIONPERMIT NO.: AP-0065-2004
ST. IVES INC. AVANTI
13449 NW 42 AVE
MIAMI, FL 33054-
(305) 685-7381CHANGE OF INFORMATION (ONLY IF DIFFERENT FROM ABOVE)

PERMITEE:

MAILING NAME:

MAILING ADD., UNIT/BAY, CITY, STATE, ZIP:

BUSINESS NAME:

BUSINESS ADD., UNIT/BAY, CITY, STATE, ZIP:

TELEPHONE:

To ensure that our records are correct, please review the information above and verify that it is accurate. Make all corrections in the CHANGE OF INFORMATION column.

This application is for a DERM AP permit for the period July 01, 2005 thru June 30, 2006 as required by County Ordinance #24-18. This application must be completed and mailed to this Department by June 15, 2005. Please note that a penalty may be assessed for applications received after the expiration date. Please attach a check to this application in the amount of \$700.00 made payable to "MIAMI DADE COUNTY," and include your operating permit number on it. This fee amount is based on the fee schedule approved by the Board of County Commissioners.

The undersigned owner or authorized representative* of ST. IVES INC. AVANTI is fully aware that the statements made in this application for an operating permit are true, correct, and complete to the best of the applicant's knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 24, Miami-Dade County Code, and all the rules and regulations of this Department.

Jeanne M Caruana
Signature, Owner or Authorized Representative

JEANNE M. CARUANA, CFO 5-6-05
Print Name and Title

Sworn and subscribed before me this 6 day of May 2005.

Isabel C. Hernandez
Notary Public (Notarization is mandatory)
*Attach letter of authorization.



Isabel C. Hernandez
Commission # DD270191
Expires: Nov 25, 2007
Address Notary
1-800-350-5161



Department of Property Appraisal

Personal Property Division

111 NW 1st Street • Suite 710

Miami, Florida 33128-1984

T 305-375-4070 F 305-375-3024

DEPARTMENT OF
ENVIRONMENTAL PROTECTION
miamidade.gov

June 22, 2005

JUN 28 2005

SITING COORDINATION

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Section
Marjory Stoneman Douglas Building
3900 Commonwealth Blvd
Tallahassee, Fl 32399-3000

Re: St. Ives Inc., Avanti

Dear Mr. Oven:

I am forwarding to you a copy of the information sent to us for a Regenerative Thermal Oxidizer-M1000 to be considered for pollution classification. Let me point out that this is the first time we have received information on this equipment.

Please review and advise us whether or not you believe this system is entitled to the pollution classification. Thank you for your time.

Sincerely,

A handwritten signature in black ink that reads "Mark Neumann".

Mark Neumann, CFE, ASA
Division Director

MN/mh
OVNBFI80.WPS.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

SITING COORDINATION OFFICE FAX COVER SHEET

OFFICE TELEPHONE NO: 850 - 245-8002
850 - 245-8003

DATE: 6/29/05

TO: Mark Neumann

FAX NO.

305 - 375 - 4421
~~3024~~

FROM: H. S. Owen

COMMENTS:

No info attached to letter

NUMBER OF PAGES FAXED (2)



DEPARTMENT OF
ENVIRONMENTAL PROTECTION

SEP 06 2005

SITING COORDINATION

Property Appraisal

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T 305-375-4070 F 305-375-3024

miamidade.gov

August 29, 2005

Hamilton S. Oven, P.E.
STATE OF FLORIDA
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, FL 32399-2400

Re: APAC
Folio: 14-422100

Dear Mr. Oven:

As explained this morning (8/29/05) via phone call, with regards to the letter I sent you dated June 13, 2005. With information requesting pollution exemption status on certain equipment for APAC Southeast, well the request was made on the wrong folio-location it should have been folio # 14-422100 @ 12201 NW 41 ST, please send me the go ahead to switch folio #'s, the equipment is the same.

Thank you,

A handwritten signature in blue ink that reads 'Gloria Royal'.

Gloria Royal, CFE.
Personal Property Specialist



Property Appraisal
Personal Property Division
111 NW 1st Street • Suite 710
Miami, Florida 33128-1984
T 305-375-4070 F 305-375-3024

miamidade.gov

August 29, 2005

**Hamilton S. Oven, P.E.
STATE OF FLORIDA
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, FL 32399-2400**

Re: Rinker Materials Corp

Dear Mr. Oven:

Please review the letter I sent you dated July 15, 2005 regarding Rinker Materials with the attachment requesting pollution status on multi folio #'s. Please send confirmation that the letter you sent granting the pollution exemption, was for all the folio #'s.

Thank you in advance for your prompt attention in this matter.

Thank you,

A handwritten signature in blue ink that reads "Gloria Royal".

**Gloria Royal, CFE.
Personal Property Specialist**

P.S. Please fax a copy of the attachment