Attachment A

Vertis, Inc. **Operation and Maintenance Plan**
Tampa Facility **Emissions Control Device**

I. Graphic Arts Printing Operations.

The O&M Plan shall specify operation and maintenance procedures that demonstrate continuous operation of the control device during periods of emission-producing operations. The Plan shall also specify which records must be kept to document these operation and maintenance procedures. The source shall retain and have such records available for inspection for the previous three years.

II. Applicability of Operation and Maintenance Plan

Vertis, Inc., has a Regenerative Thermal Oxidizer (RTO) at its Tampa Facility used to control VOC emissions.

III. Operation and Maintenance Plan

Vertis, Inc. staff shall observe the following Operation and Maintenance Plan for its control device.

A. Routine Operation and Maintenance

1. Vertis, Inc. shall install a readily visible temperature gauge which monitors the operating temperature of the emission control system at all times during operation. The combustion chamber temperature of the RTO will be monitored with a temperature indicator and continuous chart recorder, or by an electronic data system, to record average combustion chamber temperature at all times the associated printing lines are operating.

2. The Maintenance Department Manager will be responsible for the following:

    a. Visually inspecting the thermal oxidizer at least once per day, to include the temperature recorder to verify that the temperature in the RTO is at or above 1,400 F;

    b. Replacing the chart recorder paper as required by the manufacturer, or saving digital data to a specified medium;

c. Examining the chart recording or electronic data for oxidizer performance at least once per week; and

d. Storing the chart recordings or electronic data for at least 3 years and making the data available for inspection by an authorized representative of the Hillsborough County EPC.

B. Malfunction Repair

1. The oxidizer has a malfunction shutdown switch. If the oxidizer fails, the printing lines connected to it will automatically shut down. All operators are prohibited from bypassing the oxidizer during an upset breakdown condition.

2. The oxidizer and printing will automatically shutdown if the temperature of the combustion chamber drops below the set point for more than 20-minutes. All operators are prohibited from bypassing the oxidizer during an upset breakdown condition.

3. In any of the following cases, plant staff will notify the Maintenance Department Manager immediately if:

   a. Plant staff discovers from the chart recorder or electronic data, that the temperature of the combustion chamber has dropped below the set point for an extended period of time (20 minutes or longer) while the associated printing lines are operating;

   b. Plant staff discover from the digital temperature indicator that the temperature of the combustion chamber has dropped below the set point for an extended period of time (20 minutes or longer) while the associated printing lines are operating; or

   c. Plant staff discovers from weekly review of the chart recording or electronic data that the temperature of the combustion chamber has dropped below the set point for an extended period of time (20 minutes or longer) while the associated printing lines are operating.

3. The Maintenance Department Manager will be responsible for a log of the following data:

   a. Dates and times that the oxidizer was manually bypassed due to malfunction, an identification of printing lines that operated during the bypass, and how much material was consumed by each printing line;

   b. Dates and length of time that the oxidizer was shut down; and

c. Dates, times and details of repairs made to the oxidizer.

4. The data in B.3. will be recorded any time plant staff discovers a malfunction of the oxidizer.

C. Upset/Breakdown Reporting Conditions

1. The EPC will be notified of any occurrence, which constitutes an upset/breakdown condition within 24 hours of the incident.

   a. During normal business hours, verbal notification shall occur no later than one hour after the detection of an upset/breakdown condition. The verbal notification shall be followed by a written notification to the EPC no later than four hours after the detection of an upset/ breakdown condition.

   b. If the upset/breakdown occurs when the EPC cannot be contacted, the report of breakdown shall be made at the commencement of the next regular working day.

   c. The notification shall identify the time, specific location, equipment involved, and to the extent known, the cause(s) of the occurrence.

D. Maintenance

1. The following maintenance schedule shall be adhered to:

Maintenance Schedule

Maintenance Item	**Daily**	**Monthly**	**Annually**
Visually Check Unit:			
A) Hot Spots	X		
B) Fan Vibration	X		
C) Chart Recorder	X		
D) Operating Temperature	X		
E) Automatic Lubricators	X		
Check Burner Linkage		X	
Inspect Flame		X	
Manufacturers Annual Inspection:			
A) Clean UV scanner			X
B) Test Interlocks			X
C) Check Spark Plug			X
D) Check Valve Motors			X
E) Test Flame Safeguard			X
F) Inspect Poppet Valve Internals			X

Manufacturers Annual Inspection:	Daily	Monthly	Annually
G) Test Manual Gas Valves			X
H) Check Air / Gas Ratio			X
I) Inspect Fan Coupling			X
J) Leak Test Gas Train			X
K) Test Pressure Switches			X
L) Inspect Burner Components			X
M) Clean Orifice Plate			X
N) Inspect Motor			X
O) Inspect Fan Shaft			X
P) Inspect Fan Wheel			X