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MEMORANDUM

DATE: April 7, 2014

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb  **THRU:** Diana M. Lee, P.E. 
Sterlin K. Woodard, P.E.

SUBJECT: **Revised Renewal Operating Permit - Quad/Graphics Marketing, LLC**
Permit No. 0570254-027-AF

Attached is the Revised Renewal Operating Permit No. 0570254-027-AF for Quad/Graphics Marketing, LLC (Quad), a lithographic printing facility primarily engaged in the printing of advertisements. Quad is located at 4646 S. Grady Avenue, Tampa, FL. This permit renews Permit No. 0570254-022-AF and incorporates Permit No. 0570254-026-AC, which authorized the construction of a sixth printing press line.

Permit No. 0570254-027-AF was issued on April 3, 2014. On April 3, 2014, one comment on the permit was received from the facility by email. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced.

Comment No. 1: Quad requested to change the requirement to test for destruction efficiency to once every five years. There are costs associated with the stack tests and they've demonstrated compliance in the past, as indicated in the permit preamble. They are also required to maintain an O&M plan specifically for the oxidizer.

Response: After reviewing the files, it was noted that in Permit No. 0570254-022-AF, the destruction efficiency testing frequency was reduced from once per federal fiscal year to once prior to renewal of the operating permit. The testing frequency was reduced because, in accordance with the RTO's O&M Plan, the RTO is required to be inspected on an annual basis, which should provide reasonable assurance that the RTO is properly operated and maintained. In addition, the stack tests performed in 2005, 2007, 2008, and 2013 provide reasonable assurance that the RTO is able to meet the minimum destruction efficiency of 95%. Therefore, based on this, Specific Condition No. 9 is changed as follows to require destruction efficiency testing once prior to renewal per Rule 62-297.310(7)(a)3., F.A.C.

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From:

9. Test the RTO afterburner for destruction efficiency (DE) and visible emissions (VE) annually once per federal fiscal year (October 1 – September 30). In addition, test each press for capture efficiency (CE) within 180 days prior to expiration of this permit. In lieu of conducting a capture efficiency test, the applicant may elect to perform EPA Method 204. Testing shall be performed utilizing the test methods listed in Specific Condition Nos. 10, 11, 12, and 13. [Rules 62-297.310(7)(a)4. and 62-297.310(8)(b), F.A.C., and Ch. 1-3.52(6), Rules of the EPCHC]

To:

9. Test the RTO afterburner for destruction efficiency (DE) and visible emissions (VE) within 180 days prior to the expiration date of this permit. In addition, test each press for capture efficiency (CE) within 180 days prior to the expiration date of this permit. In lieu of conducting a capture efficiency test, the applicant may elect to perform EPA Method 204. Testing shall be performed utilizing the test methods listed in Specific Condition Nos. 10, 11, 12, and 13. [Rules 62-297.310(7)(a)4. and 62-297.310(8)(b), F.A.C., and Ch. 1-3.52(6), Rules of the EPCHC]

Based on our review, we recommend issuance of the permit as drafted.

LAW: 0570254-027-AF

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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Mr. Thomas Estock
Director of Environmental Management
Quad/Graphics, Inc.
N61 W23044 Harry's Way
Sussex, WI 53089-3945

File No.: 0570254-027-AF
County: Hillsborough

Enclosed is Permit Number 0570254-027-AF to operate a lithographic printing facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication.

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)

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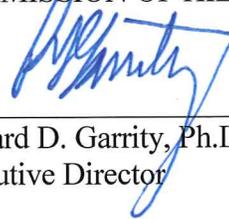
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Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

Attachment

cc: Florida Department of Environmental Protection (via email)
James Littlejohn, P.E. – Littlejohn Engineering Associates, Inc.
Bryan Olson – Quad/Graphics, Inc. (via email)



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PERMITTEE:

Quad/Graphics Marketing, LLC
4646 S. Grady Avenue
Tampa, FL 33611

PERMIT/CERTIFICATION

Permit No.: 0570254-027-AF
County: Hillsborough
Expiration Date: April 3, 2019
Project: Lithographic Printing Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This permit authorizes operation of a lithographic printing facility. The operation consists of six printing press lines described as follows:

- Line A: One 8-unit Harris N900, 46-inch heatset web offset printing press with two (2) MEG dryers. The maximum heat input per dryer is 3.96 MMBTU/hr. The press can print both sides of a continuous paper roll simultaneously, in multiple colors up to 1,800 fpm.
- Line D: One 4 unit Harris N954, 54-inch heatset web offset printing press with a C-2400 dryer having a maximum heat input of 6.160 MMBTU/hr. The press can print both sides of a continuous paper roll simultaneously in multiple colors up to 1,800 fpm.
- Line E: One 4 unit Harris N956, 56-inch heatset web offset printing press with a TEC dryer having a maximum heat input of 7.7 MMBTU/hr. The press can print both sides of a continuous paper roll simultaneously in multiple colors up to 2,000 fpm.
- Line G: One 4-unit Goss C700, 66-inch heatset web offset printing press with a MEGTEC dryer having a maximum heat input of 8.0 MMBtu/hr. The press can print both sides of a continuous paper roll simultaneously in multiple colors up to 3,000 fpm. An auto blanket wash system is installed on Line G.

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PERMITTEE:
Quad/Graphics Marketing, LLC

PERMIT/CERTIFICATION No.: 0570254-027-AF
PROJECT: Lithographic Printing Operation

SPECIFIC CONDITIONS:

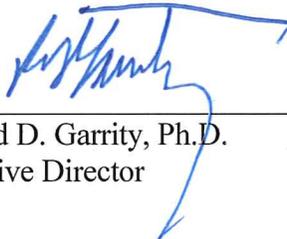
of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment listed on page 1 through 3 of this permit.
- B) Installation or addition of any equipment which is a source of air pollution.

24. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

25. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operating permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rules 62-4.090, F.A.C.]

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