

The permit application stated that the facility is in long-term shutdown. However, after further conversations with the facility, it was clarified that the printing press line is operated approximately eighteen hours per year to ensure that the press line remains operational in case it is needed.

The facility has been issued three warning notices within the last five years. In April 2008, a Warning Notice was issued for failure to provide records of coating usages and emissions for the previous two years. In July 2008, a Warning Notice was issued for replacement of the two natural gas-fired dryers without a permit. Both Warning Notices were closed without any enforcement action. In addition, in May 2013, a Warning Notice was issued for failure to submit the 2012 AOR. The facility submitted the AOR on May 23, 2013 and the WN was closed without any enforcement action.

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

LAW: 0571251-006-AO

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Mr. Jean Turgeon
Senior Director of Operations
GTECH Printing Corporation
4100 S. Frontage Road, Building 400
Lakeland, FL 33815

File No.: 0571251-006-AO
County: Hillsborough

Enclosed is Permit Number 0571251-006-AO for the operation of a wide-web, flexographic and lithographic printing facility, issued pursuant to Section 403.087, Florida Statutes.

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) 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC'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, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC'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 petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

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

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision.

Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

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

Attachment

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

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

Clerk

Date

PERMITTEE:
GTECH Printing Corporation
2401 Police Center Drive, Suite 110
Plant City, FL 33566

PERMIT/CERTIFICATION
Permit No.: 0571251-006-AO
County: Hillsborough
Expiration Date: June 19, 2018
Project: Flexographic and Lithographic Printing Facility

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 the operation of a wide-web, flexographic and lithographic printing operation on a continuous web substrate. The facility operates one printing line consisting of 13-flexographic printing press units, 8-lithographic printing press units, and 2-inkjet printing units. All twenty-three (23) press units operate in series. The flexographic printing inks are cured by two natural gas-fired drying ovens which operate between 200 and 250 °F. Drying oven No. 1 has a Maxon, 456M burner, with a heat input rating of 4.9 MMBtu/hr. Drying oven No. 2 has a Maxon, 425 burner, with a heat input rating of 2.2 MMBtu/hr. The dryers are vented to the outside of the building and have no air pollution control devices installed. The lithographic printing inks and the inkjet printing inks are cured by ultraviolet light and infrared heat lamps, respectively. The printing line is capable of handling webs up to 20 inches wide at speeds up to 580 feet per minute. The finished product is trimmed, cut, and folded for packaging.

The facility also operates a scrap collection system, which vents indoors. Waste paper from the trim machine and the paper shredding machine is ducted to a cyclone. The larger particulate matter (PM) drops into a baler that is located inside the building. Any remaining PM from the cyclone exhausts to the inside of the building. The scrap collection system vents indoors and is exempt from permitting. In addition, the natural gas usage for the two drying ovens is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

Location: 2401 Police Center Drive, Suite 110, Plant City, 33566

UTM: 17-390.9 E and 3096.46 N NEDS NO: 1251

Emission Unit No. 001 - One Printing Line

References Permit No.: 0571251-001-AC

Replaces Permit No.: 0571251-004-AO

PERMITTEE:
GTECH Printing Corporation

PERMIT/CERTIFICATION NO.: 0571251-006-AO
PROJECT: Flexographic and Lithographic Printing Facility

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. 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.]
5. The use of property, facilities, equipment, processes, products, or compounds, or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
6. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rules 62-296.320(1) and 62-4.070(3), F.A.C. and Permit No. 0571251-001-AC]
 - A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
 - B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
 - C) Immediately attend to all spills/waste as appropriate.
7. In order to limit the potential to emit and establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-296.320, 62-212.300, and 62-4.070(3), F.A.C., 40 CFR 63.820(a)(2), and Permit No. 0571251-001-AC]
 - A) The maximum VOC emissions from the entire facility shall not exceed 85.9 tons for any 12 consecutive month period.
 - B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
8. In order to ensure compliance with Specific Condition Nos. 4 and 7, the following restrictions and limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0571251-001-AC]

PERMITTEE:
GTECH Printing Corporation

PERMIT/CERTIFICATION NO.: 0571251-006-AO
PROJECT: Flexographic and Lithographic Printing Facility

SPECIFIC CONDITIONS:

A) Maximum material usages in any 12 consecutive month period:

Group Name	Annual Limit
Fountain Solutions	1,266 gallons/yr
Base Coats	27,931 gallons/yr
Ink Jet Inks	22,931 gallons/yr
UV Litho (Offset) Inks	5,452 gallons/yr
UV Flexo Inks	15,149 gallons/yr
Flexo Scratch-Off Inks	11,024 gallons/yr
Pre-Press Chemicals	408 gallons/yr
Water-based Overprint Inks	19,722 gallons/yr
Solvent-based Diluents	6,399 gallons/yr

B) Maximum VOC concentrations of any product used in each group category:

Group Name	Max. VOC Concentration
Fountain Solutions	1.77 lb/gallon
Base Coats	0.37 lb/gallon
Ink Jet Inks	0.48 lb/gallon
UV Litho (Offset) Inks	0.14 lb/gallon
UV Flexo Inks	0.00 lb/gallon
Flexo Scratch-Off Inks	4.96 lb/gallon
Pre-Press Chemicals	7.90 lb/gallon
Water-based Overprint Inks	2.16 lb/gallon
Solvent-based Diluents	7.27 lb/gallon

9. All volatile organic compound emissions from solvent washings shall be considered in the material usage limitations of Specific Condition No. 8.A), unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-4.070(3), F.A.C.]

10. Compliance with the VOC and HAP emission limitations of Specific Condition No. 7 shall be determined using a monthly recordkeeping system and EPA Method 24 or 24A contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Environmental Protection Commission of Hillsborough County may accept a certification by the ink manufacturer of the composition of the ink if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document Number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." The records shall include MSD sheets for each ink and solvent used and the VOC content "as supplied" for each ink and solvent used. Records of the ink composition shall be kept on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County. [Rule 62-4.070(3), F.A.C.]

11. The permittee chooses to commit to and meet the emission limits specified in 40 CFR 63.820(a)(2) (Specific Condition No. 7.B)) and is considered an area source of HAP. Therefore, the facility is subject

PERMITTEE:
GTECH Printing Corporation

PERMIT/CERTIFICATION NO.: 0571251-006-AO
PROJECT: Flexographic and Lithographic Printing Facility

SPECIFIC CONDITIONS:

only to the provisions of 40 CFR 63.829(d) (Specific Condition No. 13) and 40 CFR 63.830(b)(1) (Specific Condition No. 20). [40 CFR 63.820(a)(3)]

12. Visible emissions from the facility, including the exhaust from the dryers, shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

Recordkeeping Requirements

13. Compliance with Specific Condition Nos. 8 and 10 shall be demonstrated through the use of a monthly recordkeeping system. The records shall be made available to the Environmental Protection Commission of Hillsborough County, the Florida Department of Environmental Protection or federal air pollution agency upon request and remain on file for at least three (3) years. The records shall include, but are not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., and 40 CFR 63.829(d)]

- A) Month, Year
- B) The monthly amount, in gallons, and the material group name, as specified in Specific Condition No. 8.A), for each material used
- C) The specific gravity or density of each VOC containing material
- D) The VOC concentration, in lb/gal, for each material used
- E) The HAP concentration, in lb/gal or percentage by weight, for each individual HAP for each material used
- F) The monthly amount of VOC emissions (in pounds), the monthly amount of each individual HAP emissions (in pounds), and the monthly total combined HAP emissions (in pounds) emitted for each material used
- G) A rolling total of material usage and emissions, as specified above in B) and F) above, for the most recent twelve months, calculated monthly
- H) Records as required by Specific Condition No. 10

14. In all calculations, the highest material VOC concentration and individual HAP concentration in the corresponding material group, specified in Specific Condition No. 8.A), shall be used in determining VOC and HAP emissions. [Rule 62-4.070(3), F.A.C. and Permit No. 0571251-001-AC]

Additional General Conditions

15. Each facility for which the owner or operator commits to the limits specified in 40 CFR 63.820(a)(2) (Specific Condition No. 7.B) above) to become an area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820 (a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the facility would be subject to the provisions of 40 CFR 63, Subpart KK, and would no longer be eligible to use the provisions of paragraph 40 CFR 63.820(a)(2), even

PERMITTEE:
GTECH Printing Corporation

PERMIT/CERTIFICATION NO.: 0571251-006-AO
PROJECT: Flexographic and Lithographic Printing Facility

SPECIFIC CONDITIONS:

if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2). [40 CFR 63.820(a)(5) and Rule 62-4.070(3), F.A.C.]

16. If the permittee chooses to no longer be subject to the limits specified in 40 CFR 63.820(a)(2) (Specific Condition No. 7.B) above), the permittee shall notify the Environmental Protection Commission of Hillsborough County of such change. If, by no longer being subject to the limits specified in 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source, the permittee must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources. [40 CFR 63.820(a)(6) and Rule 62-4.070(3), F.A.C.]

17. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

18. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1st, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3)(c), F.A.C.]

19. The permittee shall provide timely notification to the Environmental Protection Commission 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;
- B) Installation or addition of any equipment* which is a source of air pollution;
- C) Use of any inks, coatings, washing solutions, or cleaners which have the potential to change the facility's hourly, daily, or annual emissions.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

20. If the permittee makes any modifications which subsequently increase the emissions of hazardous air pollutants (or the potential to emit hazardous air pollutants) such that the source is a major source that is subject to an emission standard or other requirement, the permittee shall be subject to the notification requirements of 40 CFR 63.9. [40 CFR 63.820(3) and 40 CFR 63.9(b)]

21. 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

PERMITTEE:
GTECH Printing Corporation

PERMIT/CERTIFICATION NO.: 0571251-006-AO
PROJECT: Flexographic and Lithographic Printing Facility

SPECIFIC CONDITIONS:

of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

22. Prior to 60 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 and submit the most recent 3 months of records required by this permit. 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 operation 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.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director